



United States

International Trade Commission

**Annual  
Performance  
Report, FY 2024**



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# Abbreviations and Acronyms

Acronyms	Term
AD/CVD	Antidumping/Countervailing Duty
ALJ	Administrative Law Judge
AMCA	American Manufacturing Competitiveness Act of 2016
ATO	Authority to Operate
CBERA	Caribbean Basin Economic Recovery Act
CBP	U.S. Customs and Border Protection (Department of Homeland Security)
CCM	Cost Center Manager
CAIO	Chief Artificial Intelligence Officer
CDO	Chief Data Officer
CFO	Chief Financial Officer
CIO	Chief Information Officer
Commission	U.S. International Trade Commission
COR	Contracting Officer's Representative
DATA Act	Digital Accountability and Transparency Act of 2014
DataWeb	Interactive Tariff and Trade Data System
DEIA	Diversity, Equity, Inclusion, and Accessibility
DGB	Data Governance Board
EC	Office of Economics
EDIS	Electronic Document Information System
ER	Office of External Relations
ERM	enterprise risk management
FIN	Office of Finance
GC	Office of the General Counsel
GPRA	Government Performance and Results Act
HR	Office of Human Resources
HTS	Harmonized Tariff Schedule of the United States
ICA	Office of Industry and Competitiveness Analysis
ID	initial determination
IDS	Investigations Data System
INV	Office of Investigations
IT	information technology
MTB	miscellaneous tariff bill
MTBPS	Miscellaneous Tariff Bill Petition System
NAFTA	North American Free Trade Agreement
NTM	nontariff measure
NOI	Notice of Institution
OALJ	Office of the Administrative Law Judges
OARS	Office of Analysis and Research Services

<b>Acronyms</b>	<b>Term</b>
OAS	Office of Administrative Services
OB	Office of Budget
OCFO	Office of the Chief Financial Officer
OCIO	Office of the Chief Information Officer
OEEEO	Office of Equal Employment Opportunity
OIG	Office of Inspector General
OP	Office of Operations
OUII	Office of Unfair Import Investigations
PALT	Procurement Action Lead Time
PMSPC	Performance Management and Strategic Planning Committee
PR	Office of Procurement
SE	Office of the Secretary
SSS	Office of Security and Support Services
TATA	Office of Tariff Affairs and Trade Agreements
TRAO	Trade Remedy Assistance Office
URAA	Uruguay Round Agreements Act
USITC	U.S. International Trade Commission
USMCA	United States-Mexico-Canada Agreement
USTR	The Office of the U.S. Trade Representative
WCO	World Customs Organization
WTO	World Trade Organization

# Message from the Chair

I am pleased to transmit the U.S. International Trade Commission's ("Commission") Annual Performance Report for Fiscal Year (FY) 2024. This report is structured around the Commission's strategic goals and their supportive objectives outlined in our FY 2022-2026 Strategic Plan. Specifically, this annual report documents the Commission's programmatic and management performance and accomplishments for FY 2024, and our challenges going forward.

## Statutory Mandates

The Commission has three long-standing, statutory mandates: (1) investigate and make determinations in proceedings involving imports claimed to injure a domestic industry or violate U.S. intellectual property rights; (2) provide independent analysis and information on tariffs, trade, and competitiveness to the Congress and the President; and (3) maintain the Harmonized Tariff Schedule of the United States (HTS).

In carrying out these mandates, the Commission independently and objectively investigates unfair trade complaints, impartially administers the relevant trade laws, and helps the President and Congress make informed policy decisions by providing accurate, timely, and insightful analysis on an evolving range of international trade matters.

## Program Accomplishments in FY 2024

I would like to highlight the following accomplishments during the last fiscal year: the Commission made substantial progress toward achieving its strategic objectives in FY 2024; it met or exceeded most of its annual performance goals and improved upon agency performance in other areas. In FY 2024, the agency commenced 141 new investigations and completed 116 investigations in the areas of import injury, intellectual property, and industry and economic analysis.

## Investigate and Decide

In FY 2024, the Commission instituted 75 antidumping and countervailing duty investigations and reviews under Title VII of the Tariff Act of 1930, a substantial increase from the 53 investigations instituted in FY 2023. In these proceedings, the Commission determines whether a U.S. industry is materially injured or is threatened with material injury, or whether the establishment of an industry is materially retarded, by reason of dumped or subsidized imports. Under the Trade Act of 1974, the Commission is also responsible for conducting global safeguard (escape clause) and market disruption investigations. In FY 2024, import injury

investigations covered a variety of products across several industry sectors including: chemicals (e.g., hexamine, vanillin, alkyl phosphate esters, epoxy resins, ferrosilicon, dioctyl terephthalate, 2,4-dichlorophenoxyacetic acid, and melamine); metals (e.g., corrosion-resistant steel, tungsten shot, and high chrome cast iron grinding media); agriculture (e.g., warmwater shrimp); intermediate manufactured products (e.g., brake drums, fine denier polyester staple fibers); and consumer products (low speed personal transportation vehicles, combination refrigerator freezers, disposable aluminum containers, ceramic tile, and paper plates). In conducting these investigations, the Commission continued efforts to streamline proceedings and advance the use of electronic data collection, including transitioning to an improved questionnaire collection platform.

The Commission also commenced 61 new investigations under section 337 of the Tariff Act of 1930 during the fiscal year. In these investigations, the Commission determines whether imports have infringed intellectual property rights or injured a domestic industry through unfair competition or other unfair acts such as trade secret misappropriation. These investigations most frequently involve allegations of patent, trademark, or copyright infringement, although misappropriation of trade secrets, passing off, false advertising, and antitrust violations also can be litigated under section 337. These investigations are demanding, often involving multiple parties and claims. The wide range of technologies and products at issue during FY 2024 include: integrated circuits, graphics systems, robotic floor cleaning devices, firearm disassembly tongs, fitness devices, aerosol fire extinguishing devices, outdoor electronic displays, tobacco heating articles, self-balancing electric skateboards, furniture products, smart ceiling fans, LED lighting devices, and electronic devices.

### **Trade Policy Support and Information**

Drawing on its extensive expertise, the Commission at the request of Congress and the President via authorities delegated to the U.S. Trade Representative (USTR) provides state-of-the-art economic modeling and analyses to fill critical information gaps for policy makers. In FY 2024, the Commission completed 7 major factfinding investigations covering a variety of topics, such as: COVID-19 diagnostics and therapeutics and TRIPS Agreement flexibilities; and the apparel export competitiveness of certain foreign suppliers to the United States. Commission staff served as a resource to USTR and Congressional staff to discuss topics such as statutory reports, potential factfinding investigations, trade policy support, draft legislation, tariff affairs, and other issues.

During FY 2024, the Commission also compiled, updated, and published the Harmonized Tariff Schedule (HTS) 10 times to reflect policy changes implemented during the fiscal year. The

Commission's work on the HTS is essential to the effective and efficient collection of tariffs applicable to imported products.

### **Organizational Excellence**

The Commission also made steady progress on many of its management and administrative goals during FY 2024, particularly in the areas of data management, ongoing operational improvements, and information technology. The agency continued to strengthen its strategic planning and performance-management processes, improve internal controls, and incorporate enterprise-risk-management principles into its planning, administrative, and budgeting processes. The Commission also continued to strengthen the security and effectiveness of its information systems, which helps enhance the productivity and efficiency of staff.

One of the major accomplishments during FY 2024 was the completion of a comprehensive evaluation and selection of a new Shared Service Provider (SSP) for financial and administrative services. This marks a major step forward in support of strategic initiatives aimed at modernizing and strengthening financial management operations. The transition to a new SSP will enhance the efficiency and effectiveness of operations by streamlining processes and placing the agency in a position to achieve greater financial transparency, improved data accuracy, accountability, and timeliness of financial information. The Commission continued to make strides in improving its data governance activities by updating and expanding the agency guidance on data governance and leveraging technology to improve the usability of information available to decision makers. The Commission made several major technology and cybersecurity updates to its Electronic Document Information System (EDIS) including integrating multifactor authentication for external users. The Commission also continued to develop and deploy cutting edge controls to ensure data are protected from creation through destruction.

Additionally, the Commission developed a recruitment tracking app to increase transparency and efficiency of the recruitment process. The Commission also conducted strategic reviews of its performance management system, labor cost program, and travel program. These strategic reviews evaluated the efficiency and effectiveness of these programs and made recommendations for improvements.

### **Looking Forward**

Trade is a major component of the U.S. and global economies, with changes in supply chains, policies, and technologies shaping these trade flows. These dynamics in international trade have increased the complexity and scope of the Commission's investigations and analyses. The



Commission endeavors to remain at the forefront of informing trade policy, through its analysis of trade and competitiveness related to industry, economic, legal, and tariff nomenclature issues. The Commission will also continue to independently and objectively investigate unfair trade complaints and impartially administer the relevant trade laws, while producing timely, thorough and high-quality determinations and reports.

During the past fiscal year, the Commission and its staff have excelled in carrying out our mission. Despite the continuing high workload in all mission areas, the Commission met all of our statutory deadlines and received positive feedback from stakeholders. I expect the Commission and staff to continue providing high-quality, cutting-edge analysis of international trade issues to the President, Congress, and the American public, and to remain a highly regarded and independent workforce that informs U.S. trade policy in the coming year.

Working with the President, the USTR, and Congress, as well as U.S. industries, workers, and the public, the agency will continue to execute its mission with independence, integrity, trust, and transparency.



# FY 2024 Annual Performance Report

The U.S. International Trade Commission’s Annual Performance Report for FY 2024 compares our FY 2024 results with the performance goals we published in our FY 2024 Annual Performance Plan. Our planning process is carried out in accordance with the provisions of the Government Performance and Results Act of 1990 (GPRA), as amended by the GPRA Modernization Act of 2010, and related guidance from the Office of Management and Budget.

## Major Management Priorities, Challenges, and Risks

The Commission recognizes the importance of improving the use of agency resources by including a strategic goal focused on effective and efficient management—to “execute and advance organizational excellence”—in its FY 2022–FY 2026 Strategic Plan. The plan highlights five priority areas: human resources, financial management, information technology, data, and operational effectiveness. Our priority areas and specific annual performance goals align well with various government-wide initiatives such as improving mission-support operations, strengthening cybersecurity, enhancing enterprise risk management, and ensuring open data. The Commission’s Office of Inspector General (OIG) has identified data management, internal controls, and human capital management as management challenges, and, as such, they are also priorities for the Commission.

Regarding the first management challenge, managing data, the Commission recognizes that properly managed data are essential for the development of timely, reliable, and accurate information. Additionally, properly designed data systems with relevant and timely information support effective day-to-day operations, the decision-making process, and performance evaluation across the organization. The Commission is committed to improving its data governance. In connection with the second management challenge, the OIG noted that central to the Commission’s internal controls are the agency’s internal rules, and that the Commission had reiterated its commitment to improving the internal rules system. Management will continue the work to strengthen the Commission’s system of internal controls through identifying ways to streamline the rule development process and ensuring adequate resources are devoted to maintaining the system. Additionally, the Commission agrees with the OIG that effective human capital management is of utmost importance, as the Commission’s mission is entirely accomplished by and dependent on its people. To this end, the Commission

implemented several strategies this year geared toward improving hiring efficiency, optimizing succession management practices, and assessing the drivers of employee retention.

Several of the annual performance goals supporting our strategic goals are designed to address these challenges, by focusing on increasing access to various types of programmatic and financial data to support decision making; continuing efforts to update and improve internal controls; and enhancing recruitment, development, and retention of talent. In addition, IT management remains one of the agency's priorities with goals that focus on cybersecurity and IT services.

In FY 2024, the Commission continued its data governance activities. This last year, the Commission's Data Governance Board (DGB) updated its enterprise-wide data inventory and its data governance directive. The Commission also continued to expand the release of data on its Open Data page. Additionally, the Commission continued to strengthen its cybersecurity posture and continued to upgrade its IT infrastructure. We received our fourteenth consecutive unmodified opinion from financial auditors operating independently under the authority of the OIG. In addition, we continued to strengthen our enterprise risk management efforts. In FY 2025, we expect to improve access to program and financial data to provide more refined management reports to agency leaders.

During FY 2024, the Commission increased the size of its workforce and began pursuing several strategies to address the hiring challenge. These strategies included deploying an updated recruitment tracking application to identify potential areas for gaining efficiencies in the hiring process, addressing resource challenges within the Office of Human Resources, and using open, continuous vacancy announcements for certain difficult-to-fill positions. To address succession management, the Commission continued to train highly graded members of its General Schedule staff for senior leadership positions. This year, the Commission also began collecting additional data on the drivers of employee retention through agency-specific items on the Federal Employee Viewpoint Survey, as well as new exit surveys and surveys for newly onboarded employees. In FY 2025, we expect to continue building upon these strategies to improve hiring efficiency, succession planning, and assessing drivers of employee retention.

The Commission continued to research and identify better tools and strategies for efficiently and effectively carrying out its mission. Many of these improvements require adequate funding to support upfront investments, including time spent training staff, to implement.

## Reviews and Evaluations

Each quarter, agency leaders and other senior staff review progress on our strategic and management objectives and identify and discuss enterprise risks. These reviews, along with the evidence related to specific performance goals and associated risks identified by our managers, inform the development of our Annual Performance Plan and Congressional Budget Justification. We continue to evaluate how to improve our planning and enterprise risk management (ERM) processes and how to make more effective use of the data we collect.

The Commission evaluates risks through the Agency-wide Management Committees. Committees provide information to the Performance Management and Strategic Planning Committee (PMSPC) on changes to the risks. The PMSPC makes a final determination on risks, as they relate to the Top Agency Risks. This process is designed to ensure an in-depth analysis of risks and their importance to the Commission as it monitors challenges and risks associated with its ability to meet the mission and achieve performance goals. In addition, the Chief Data Officer (CDO) and the Data Governance Board (DGB) support the agency's ongoing efforts to more systematically use evidence to support planning and decision-making. Furthermore, PMSPC identified a performance goal to conduct annual evaluations of programs or processes identified as priorities.

In FY 2024, we made progress on all strategic and management objectives. Appendix B describes our data sources for each of the strategic and management objectives, as well as our verification and validation process.

## Structure of the Report

The remainder of this report consists of sections for the Commission's strategic goals:

- **Investigate: Conduct Reliable and Thorough Investigations**
- **Inform: Develop Sound and Informed Analyses and Determinations**
- **Perform: Execute and Advance Organizational Excellence**

Each section describes objectives and corresponding performance goals along with the strategies used to make progress on these goals. The sections also highlight significant accomplishments, as well as areas in which we did not meet our annual targets. Where possible and relevant, the sections provide historical performance information.

## Strategic Goal 1

### Investigate: Conduct Reliable and Thorough Investigations

The Commission's investigations often involve products or industries that are critical to U.S. productivity, innovation, and competitiveness, and policymakers and businesses may make important decisions based on Commission analysis and determinations.

In its trade remedy proceedings, the Commission administers and applies U.S. laws concerning allegations of subsidized and dumped imports that injure a domestic industry, surges of imports that allegedly injure a domestic industry, and imports that allegedly infringe domestic intellectual property rights or are otherwise involved in unfair acts or methods of competition. U.S. laws and U.S. international obligations require the Commission to conduct thorough investigations and sound factfinding. The resulting determinations must be timely and consistent with the law.

Under its statutory responsibilities, the Commission also provides relevant and independent information, analysis, and data to the Congress, the President, and the United States Trade Representative on a timely basis to inform and support decision-making and policy development to address increasingly complex trade and competitiveness-related issues. The Commission's specialized ability to collect, develop, and synthesize primary data and information and provide multidisciplinary analysis supports the development of sound trade policy. Achieving this goal in a timely manner assists policymakers with decisions related to trade negotiations, enacting legislation, or taking other policy actions that affect U.S. workers and the competitiveness of U.S. industries and the overall U.S. economy.

By statute, the Commission publishes and maintains the Harmonized Tariff Schedule of the United States (HTS), which serves as the legal basis for the collection of customs duties and the compilation of trade data. The HTS is vital to U.S. businesses, government agencies, and other stakeholders interested in international trade activity.

The increasing complexity of the Commission's investigations, the variable and increased caseload, and challenges in recruiting and retaining qualified and experienced staff challenge the Commission's ability to complete investigations and provide information and analysis in a timely manner. The Commission must balance the goals of timeliness, transparency, due process, and thorough and high-quality determinations and reports.

In FY 2024, the Commission's import injury mission activity increased substantially, nearing record levels in petition filings. The Commission experienced a surge in AD/CVD filings, and caseload is expected to remain very high in the near future driven by original as well as 5-year review investigations. Although AD/CVD investigations represent the bulk of import injury activity, the Commission also handled litigation-related activity, conducted a global safeguard investigation, and completed follow-on safeguard-related investigations.

In FY 2024, the number of complaints filed in active unfair import (section 337) investigations normalized to the ten-year rolling average, demonstrating the sustained increase in workload in this mission area for the past decade. Unfair import evidentiary hearings returned to in-person appearances, unless the administrative law judge determined circumstances warranted a witness appearing remotely during the hearing. Resource limitations continued to present challenges in this area.

In FY 2024, the workload for factfinding investigations and trade policy support remained stable. The fiscal year ended near the high-water mark in hours worked due to the complex nature of topics covered. The increasing complexity of the topics, ranging from the relationship between patent protections and access to medicines to estimating the greenhouse gas emissions intensity of U.S. industries, as well as multi-sector surveys, accounted for much of the increase in hours. In addition, travel restrictions imposed by the State Department due to political instability sometimes limited the ability of staff to gather qualitative information in key markets.

## **Strategic Objective 1.1**

### **Reliable: Conduct expeditious and transparent proceedings<sup>1</sup>**

The Commission is charged with conducting timely and transparent proceedings. Our proceedings involve many different industries, product markets, and parties often representing a broad array of interests, from single inventors (as in some unfair import investigations) and corporations with revenues of less than one million dollars, to the largest multinational corporations and unions representing thousands of workers. All these groups benefit from Commission proceedings that are fair, timely, and transparent consistent with applicable U.S. law.

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<sup>1</sup> The leader for this strategic objective is the Director of the Office of Unfair Import Investigations (OUII).

Reaching decisions expeditiously and through transparent proceedings is critical to affected industries and policy makers. In import injury proceedings, timely decisions are critical to domestic industries who are injured due to unfairly priced or subsidized imports or surges of imports. The Commission continues to improve and advance tools that collect information from and provide information to internal and external stakeholders in a timely, fair, and efficient manner. These efforts enhance participation in, understanding of, and the reliability of the record for import injury investigations. In unfair import proceedings, timely decisions are critical because of the relief they provide industries injured by unfair trade within the lifecycle of a product and to avoid legal uncertainties created by prolonged litigation. In factfinding proceedings, timely investigations are critical to the policymakers trying to understand the effects of domestic and foreign trade policies, to understand competitive conditions in markets being investigated, or to prepare for trade-related negotiations.

The Commission strives to act expeditiously in all our proceedings. The Commission will continue to report on the timeliness of meeting our statutory requirements and the length of time it takes to complete unfair import investigations. The Commission will also report whether new techniques to shorten investigations are successful.

Transparency is also critical to ensuring reliable proceedings. The Commission is working to expand public access to Commission documents and statistical information and to ensure that other stakeholders remain knowledgeable about its investigative processes and procedures. We have created performance objectives to promote greater transparency and a fuller understanding of the Commission's factfinding, import injury, and unfair import investigations for all stakeholders by ensuring that accurate public information about our proceedings is easily accessible as soon as practicable.

This past fiscal year, we met most of the performance goals we set for Strategic Objective 1.1. We continued to meet our statutory deadlines and regulatory goals to promote transparency of our proceedings. We continued to assess whether various procedures increased efficiencies. We continued to use the assessments to measure whether the procedures are helping us to meet our strategic objective.

The Commission faces several external challenges that can impact achievement of this strategic objective. These challenges include the inability to control the number, timing, or breadth of investigation requests or petitions we receive. By statute and regulation, we must respond to these requests and petitions and complete these proceedings within the statutory deadlines, requestor-imposed deadlines, or the earliest practicable date. While we have continued to meet our statutory deadlines in Title VII proceedings and requestor-imposed deadlines in 332 proceedings, our ability to issue decisions in section 337 investigations within target dates has

been challenged. Uncertainty regarding timing and number of new investigations and challenges in recruiting and retaining qualified and experienced staff has hampered the Commission’s ability to enhance systems, improve processes, and invest in efficiency-enhancing activities.

The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

**Performance goal 1.11:**

Deliver 100 percent of import injury investigation determinations and reports to meet the statutory deadline

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target (%)	100	100	100	100	100
Results (%)	100	100	100	100	100
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Submission of Commission determinations and reports to Commerce.

In FY 2024, despite high and increasing caseload levels, we continued to meet our statutory deadlines. Resource constraints, including the need to recruit behind departures, may challenge our ability to continue to meet these deadlines in FY 2025 and FY 2026.

**Performance goal 1.12:**

Deliver 100 percent of statutory factfinding investigations by the deadlines set by statute or the requestor

	FY 2023	FY 2024
Target (%)	100	100
Results (%)	100	100
Status	Target met	Target met

Performance indicator: Submission of Commission reports to Requestor.

In FY 2024, we continued to meet 100 percent of our requestor-imposed deadlines. Meeting these deadlines in FY 2025 and FY 2026 will continue to be challenging because of resource constraints across the agency and the anticipated continued complexity of investigations.



## Performance goal 1.13:

Conclude investigations into alleged section 337 violations within timeframes that are consistent with the Uruguay Round Agreements Act implementing report by FY 2026<sup>a</sup>

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	—	—	—	15 months	15 months
Results	18.6 months	18.2 months	17.1 months	17.5 months	18.0 months
Status	Not on track to meet FY 2022 target	Not on track to meet FY 2022 target	On track to meet target in FY 2026	On track to meet target in FY 2026	At risk of not meeting target in FY 2026

Performance indicator: annual average length of investigations concluded on the merits.

In FY 2024, the Commission's continued progress towards meeting this goal was impacted by resource constraints as the Commission sought to onboard new staff. This goal was also impacted by complex investigations, involving novel issues, complex domestic industry analyses, and complex technology. The Commission's timeline for completing section 337 investigations in FY 2024 grew to 18 months, after having declined to 17.1 months in FY 2022.

### Performance goal 1.13(a):

Shorten average time between section 337 Final ALJ Initial Determination (ID) and the Commission's final determination

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Average length of time between Final ID and completion of the Commission's final determination is less in FY 2020 than it was in FY 2019	Average length of time between Final ID and completion of the Commission's final determination is less in FY 2021 than it was in FY 2020	Average length of time between Final ID and completion of the Commission's final determination is less in FY 2022 than it was in FY 2021	Average length of time between Final ID and completion of the Commission's final determination is less in FY 2023 than it was in FY 2022	Average length of time between Final ID and completion of the Commission's final determination is less in FY 2024 than it was in FY 2023
Result	5.43 months	4.94 months	4.5 months (0.44 months less than the previous year)	5.1 months (0.6 months longer than the previous year)	5.6 months (0.5 months longer than the previous year)
Status	Target not met	Target met	Target met	Target not met	Target not met

Performance indicator: Number of months between Final ID and the issuance of the Commission's final determination.

Note: Prior to FY 2020, the goal was "Improve average time between section 337 Final ALJ Initial Determination (ID) and completion of Commission review."

This performance goal is intended to help the Commission assess, in a more granular way, where process improvements may increase efficiencies. During FY 2024, the length of time increased between the final ID and completion of the investigation. This goal was impacted by resources as the Commission sought to onboard new staff as well as

such factors as novel issues raised, complex domestic industry analysis, and complex technology.

**Performance goal 1.13(b):**

Average length time between institution of the investigation and issuance of the final ID is consistent with the timeframe set forth in Commission's goal 1.13 and Commission Rule 210.42(a)(1)(i)

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Average length of time between the institution of an investigation and the issuance of the final ID is less in FY 2020 than it was in FY 2019	Average length of time between the institution of an investigation and the issuance of the final ID is less in FY 2021 than it was in FY 2020	Average length of time between the institution of an investigation and the issuance of the final ID is less in FY 2022 than it was in FY 2021	Average length of time between the institution of an investigation and the issuance of the final ID is less in FY 2023 than it was in FY 2022	Average length of time between the institution of an investigation and the issuance of the final ID is less in FY 2024 than it was in FY 2023
Result	13.21 months	13.26 months	12.6 months	12.42 months	12.4 months
Status	Target not met	Target not met	Target met	Target met	Target met

Performance indicator: Number of months between institution of investigation and issuance of Final ID for investigations in which a final Commission determination on the merits has issued during the fiscal year.

Note: Prior to FY 2020, the goal was “Improve average time between institution of investigation and issuance of final ID.”

This information allows the Commission to assess whether process improvements need to be made to increase efficiencies in this segment of the proceedings. During FY 2024, the length of time remained the same between institution and the final initial determination, despite an increase in the number of investigations filed. Since Commission Rule 210.42(a)(1)(i) provides that a final ID must issue four months before the target date, this time between institution and the final initial determination corresponds to a 16.4-month investigation (1.4 months above the target for performance goal 1.14, but below the current average actual time for completion on the merits (18 months)).

## Performance goal 1.13(c):

Assess effectiveness of early disposition program and implement changes if appropriate

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Information assessed; improvements implemented	Information assessed; improvements implemented	Information assessed; improvements implemented	Information assessed; improvements implemented	Information assessed; improvements implemented
Results	Assessment completed; recommendations made	Assessment completed; recommendations made	Assessment completed; recommendations made	Assessment completed; recommendations made	Assessment completed; recommendations made
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Report on assessment of effectiveness

In FY 2024, the Commission conducted the requisite assessment. This year's assessment reviewed the one investigation in the program, which was still pending and in which no action was taken on the early disposition issue. Recommendations were made to continue with the early disposition program as it remains an important tool to provide an opportunity for early disposition of investigations where appropriate.

## Performance goal 1.13(d):

Assess effectiveness of severing rules and implement changes, if appropriate

	FY 2021	FY 2022	FY 2023	FY 2024
Target	Complete assessment and provide proposal, if warranted	Complete assessment and implement changes, if warranted	Complete assessment and implement changes, if warranted	Complete assessment and implement changes, if warranted
Results	Assessment completed	Assessment completed	Assessment completed; recommendations made	Assessment completed; recommendations made
Status	Target met	Target met	Target met	Target met

Performance indicator: Assessment; proposal.

Note: See the USITC's Annual Performance Plan, FY 2019–FY 2020 and Annual Performance Report, FY 2018, for previous goals designed to shorten average target dates.

This year, we continued to assess how and when these rules were used and whether there was an impact on caseload management. Looking at the series of now terminated investigations that stemmed from the same complaints, there has been positive impact on overall investigation length, with only one of the resulting investigations proceeding to a decision on the merits after an evidentiary hearing. Having assessed this program

for six years, the Commission has determined that it is working effectively and is retiring this goal.

### Performance goal 1.14:

Improve the timeliness of section 337 ancillary proceedings by meeting targets for or reducing the average length of ancillary proceedings

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Modification</b>					
Target	6 months	6 months	6 months	6 months	6 months
Results	0.03 months	5 months	0.03 months	None	None
Status	Target met	Target met	Target met	—	—
<b>Advisory</b>					
Target	9 months	9 months	9 months	9 months	9 months
Results	None	None	None	None	None
Status	—	—	—	—	—
<b>Enforcement</b>					
Target	12 months	12 months	12 months	12 months	12 months
Results	None	None	12.76 months	10.7 months	7.2 months
Status	—	—	Target not met	Target met	Target met
<b>Federal Circuit remand</b>					
Target	12 months	12 months	12 months	12 months	12 months
Results	18.32 months	27.2 months	4 months	4.3 months	0.7 months
Status	Target not met	Target not met	Target met	Target met	Target met
<b>Consolidated ancillaries</b>					
Target	15 months	15 months	15 months	15 months	15 months
Results	None	None	None	None	None
Status	—	—	—	—	—

Performance indicator: Length of ancillary proceedings concluded on the merits.

Note: prior to FY 2019, the goal was: “Improve the timeliness of ancillary proceedings by reducing the average length of ancillary proceedings as follows.”

During this fiscal year there were a number of ancillary proceedings commenced and several completed on the merits, including one enforcement proceeding, one Federal Circuit remand, and two modification proceedings. The modification proceedings were placed in the Commission’s pilot program on ancillaries which differ depending on the office assigned the ancillary. See performance goal 1.16 for more information.

Since FY 2019, we have not included ancillaries (advisories and modifications) that are part of the pilot in the calculations for performance goal 1.15. The length of ancillaries (advisories and modifications) in the pilot are recorded in performance goal 1.16 below. The Commission met its performance targets for completions of enforcements and Federal Circuit remands this year.

## Performance goal 1.15:

Individual offices complete their portions of section 337 modifications and advisory proceedings under the pilot program within specified timeframes

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Modification: GC					
Target	2–3 months	2–3 months	2–3 months	2-3 months	2-3 months
Results	None	None	None	None	0.03 months
Status	—	—	—	—	Target met
Modification: OUII					
Target	3–6 months	3–6 months	3–6 months	3-6 months	3-6 months
Results	None	None	None	None	None
Status	—	—	—	—	—
Modification: ALJ					
Target	6–9 months	6–9 months	6–9 months	6-9 months	6-9 months
Results	7.2 months	10.4 months	None	2.2 months	2.6 months
Status	Target met	Target not met	—	Target met	Target met
Advisory: GC					
Target	2–3 months	2–3 months	2–3 months	2-3 months	2-3 months
Results	None	3 months	3.2 months	None	None
Status	—	Target met	Target not met	—	—
Advisory: OUII					
Target	3–6 months	3–6 months	3–6 months	3-6 months	3-6 months
Results	None	None	None	None	None
Status	—	—	—	—	—
Advisory: ALJ					
Target	6–9 months	6–9 months	6–9 months	6-9 months	6-9 months
Results	None	6.2 months	3.9 months	None	None
Status	—	Target met	Target met	—	—

Performance indicator: Number of months to complete 337 modifications and advisory proceedings covered by the pilot program.

The Commission met its target for modifications before the Office of General Counsel and before the ALJs under the pilot program by completing two modifications well within the pilot time frames.

## Performance goal 1.16:

Post information on import injury investigations within specific time frames

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	85% of information posted within 48 hours and 90% within 72 hours of issuance	85% of information posted within 48 hours and 90% within 72 hours of issuance; evaluate changes to products and processes to conform to implementation of investigations data system.	85% of information posted within 48 hours and 90% within 72 hours of issuance; evaluate changes to products and processes to conform to implementation of investigations data system	85% of information posted within 48 hours and 90% within 72 hours of issuance; evaluate changes to products and processes to conform to implementation of investigations data system	95% of information posted within 48 hours of issuance
Results	Posting targets were met or exceeded during the FY	Posting targets were met or exceeded during the FY	Posting targets were met or exceeded during the FY	Posting targets were met or exceeded during the FY	Posting targets met during the FY
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Investigation-related information posted.

During FY 2024, we leveraged the agency-wide investment in the Commission's Investigations Database System to further improve not only the comprehensiveness and timeliness of import injury-related information, but also the efficiency of tracking timeliness. In FY 2024, the Commission posted 97 percent of documents issued by the agency or published in the Federal Register within two business days, and developed IDS-based business intelligence reports to replace previous manually tracked metrics information.

## Performance goal 1.17:

Post documents to the Electronic Document Information System (EDIS) within specified timeframes

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
<b>Factfinding: 24 hours</b>					
Target (%)	NA	NA	NA	NA	Establish baseline
Results (%)	NA	NA	NA	NA	85
Status	NA	NA	NA	NA	Target met
<b>Factfinding: 48 Hours</b>					
Target (%)	NA	NA	NA	NA	Establish baseline
Results (%)	NA	NA	NA	NA	95
Status	NA	NA	NA	NA	Target met
<b>Import Injury: 24 Hours</b>					
Target (%)	85	85	85	85	85
Results (%)	97.5	98.1	97.4	96.7	97.5
Status	Target met	Target met	Target met	Target met	Target met
<b>Import Injury: 48 Hours</b>					
Target (%)	95	95	95	95	95
Results (%)	99.7	99.6	99.7	99.5	99.7
Status	Target met	Target met	Target met	Target met	Target met
<b>Section 337: 24 hours</b>					
Target (%)	85	85	85	85	85
Results (%)	98.9	99.4	98.0	97.6	98.7
Status	Target met	Target met	Target met	Target met	Target met
<b>Section 337: 48 Hours</b>					
Target (%)	95	95	95	95	95
Results (%)	99.8	99.8	99.7	99.8	99.9
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Percentage of documents posted.

In FY 2024, we successfully established a baseline for posting to EDIS documents relating to factfinding investigations. The ability to meet this metric in the future will fluctuate depending on the number and extent of filing issues, especially given the high number of first-time filers in factfinding matters. We continued to meet this performance goal for import injury- and section 337-related investigations.



## Performance goal 1.18:

Post public versions of confidential section 337 final IDs and Commission opinions within specified timeframes

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Average length of time to post public versions of confidential section 337 Final IDs and Commission opinions is 30 days or less	Average length of time to post public versions of confidential section 337 Final IDs and Commission opinions is 30 days or less	Average length of time to post public versions of confidential section 337 Final IDs and Commission opinions is 30 days or less	Average length of time to post public versions of confidential section 337 Final IDs and Commission opinions is 30 days or less	Average length of time to post public versions of confidential section 337 Final IDs and Commission opinions is 30 days or less
Result	31.1, days on average, to issue public final IDs and 21.2 days, on average, to issue public versions of Commission Opinions	24 days on average to issue public final IDs and 22 days on average to issue public Commission Opinions	28.1 days on average to issue public final IDs and 26.9 days on average to issue public Commission Opinions	25.3 days on average to issue public final IDs and 17.3 days on average to issue public Commission opinions.	16.3 days on average to issue public final IDs; 15.7 days on average to issue public Commission Opinions.
Status	Partially met	Target met	Target met	Target met	Target met

Performance indicator: Number of days between issuance of confidential Commission section 337 opinions and posting of the public version.

During FY 2024, the Administrative Law Judges and the Commission issued public versions of final initial determinations and Commission opinions in compliance with the Commission Rules.

## Performance goal 1.19<sup>2</sup>:

Evaluate internal factfinding processes and procedures and implement ways to make this process more efficient and effective

	FY 2022	FY 2023	FY 2024
Target	Evaluate factfinding review processes and procedures and make recommendations for improvements and implement those improvements as appropriate	Prioritize, implement, and evaluate improvements to the factfinding processes and procedures.	Prioritize, implement, and evaluate improvements to the factfinding processes and procedures.
Results	Staff proposed new factfinding review process and began incorporating it into scheduled reports as appropriate	The Process Advisory Group (PAG) undertook 11 process improvement initiatives in FY 2023.	The Process Advisory Group (PAG) undertook 8 administrative process improvement initiatives and 11 Manual specific process improvement initiatives in FY 2024.
Status	Target met	Target met	Target met

Performance indicator: Factfinding process improvements identified, prioritized, and implemented. Evaluations of improvements completed.

<sup>2</sup> This performance goal was performance goal 2.26 in last year's APP/APR.

In FY 2024, staff continued to dedicate significant resources to make improvements to the factfinding process, from initial drafting to information handling. In addition, we implemented updated internal controls and streamlined the templates for capturing and consistently citing bibliographic entries.

## Strategic Objective 1.2

### **Thorough: Engage the public, including stakeholders and experts, and collect all relevant data to inform and support investigations<sup>3</sup>**

The Commission is committed to the rigorous examination and thoughtful assessment of the trade and competitiveness-related issues that come before it. This commitment extends across all mission areas and to stakeholders and the public at large, as well as to requestors and other policymakers.

Substantive engagement and comprehensive information collection are fundamental characteristics of the Commission's adjudicative-focused and factfinding activities and are essential to sound decision-making and preservation of the public trust. Regular engagement of U.S. and international legal and technical expertise ensures the accuracy and reliability of the HTS, thereby providing a sound basis for decision-making and compliance.

Public engagement and access to agency information and processes promote stakeholder understanding of and effective participation in Commission proceedings. The Commission regularly conducts outreach and solicits feedback from its requestors and key stakeholders, including providing informal advice and assistance to support small entities' access to available remedies and benefits under the trade laws. The Commission uses formal tools such as *Federal Register* notices, surveys, and briefings to solicit feedback and to identify emerging areas of interest from stakeholders and other private parties. The Commission updates the public on its activities through the agency's website and mailing lists. Commission staff also engage stakeholders at key points during proceedings and in the process of developing requested analysis and information. Information received from stakeholders is regularly reviewed and integrated as necessary into investigation analysis and work products, as well as process and communication improvement efforts.

The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

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<sup>3</sup> The leader for this strategic objective is the Director of the Office of Investigations (INV).

## Performance goal 1.21:

Conduct outreach to bar groups and other stakeholders in import injury and unfair import investigations to ensure they understand Commission capabilities and processes

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Efforts made each quarter	Efforts made each quarter	Efforts made each quarter	Efforts made each quarter	Efforts made each quarter
Results	Outreach conducted	Outreach conducted	Outreach conducted	Outreach conducted	Outreach conducted
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Outreach efforts.

During FY 2024, Commission staff conducted substantial and substantive outreach efforts throughout the fiscal year to a diverse set of stakeholders. These interactions provided firms the confidential opportunity to better understand and receive feedback on their draft petitions and the statutory requirements and process for import injury investigations. Such information reduces potential hurdles for filing firms and improves counsel's ability to effectively advocate for their clients' industry. These efforts have been increasingly critical with the increased interest in use of trade remedy options by less experienced counsel and firms. Commission staff also participated at the Annual International Trade Update, a continuing legal education program for the trade and customs bar held annually by Georgetown Law. At this program, Commission staff provided information on several process-related topics, including best practices for comments on draft questionnaires, challenges with the influx of petitions, and impact of hybrid conferences on transparency and public engagement.

In unfair import investigations, Commission staff regularly attend meetings of the attorneys' bar to inform the relevant stakeholders of new rulings, new IT upgrades to EDIS and data resources, and changes at the Commission. Staff are also panelists at conferences discussing topics relevant to practice before the Commission in unfair import investigations. Preparing for and participating in these panel discussions provides staff with the opportunity to obtain and provide data to facilitate effective decision-making by both the Commission and entities seeking unfair import relief and to inform the public about this area of the agency's mission. Commission Staff also continue to meet with potential complainants to provide feedback on draft complaints and explain the process.

## Performance goal 1.22:

Engage Commission requestors and other U.S. and international experts to enhance agency capabilities in order to inform and support analysis, data, and nomenclature services

FY 2025–FY 2026	
Target	Briefings and meetings with requestor and non-requestor experts and a wide range of stakeholders generate actionable feedback
Results	Ongoing
Status	Ongoing

Performance indicator: Feedback provided during briefings and meetings.

Other indicator: Share of delivered, Commission requestor requested products for which briefings are conducted.

Note: Prior to FY 2020, the goal was “Engage Commission customers and other U.S. and international experts to enhance agency capabilities in order to provide effective and responsive analysis, data, and nomenclature services.” Similar changes were made to subsidiary performance goals designated “a” and “b” and “c”.

## Performance goal 1.22(a):

Engage Commission factfinding requestors on Commission work products, understand their priorities, and seek feedback for future Commission work.

	FY 2021	FY 2022	FY 2023	FY 2024
Target	Engagement with requestors related to Commission reports and other products generates feedback; actions taken, as appropriate.	Engagement with requestors related to Commission work product generates feedback; actions taken, as appropriate.	Engagement with factfinding requestors related to Commission work product generates feedback; actions taken, as appropriate.	Engagement with factfinding requestors related to Commission work product generates feedback; updates to ongoing or future work products taken in response to feedback where appropriate.
Results	Post-delivery briefings conducted in FY 2021, including briefings for the TPA Retrospective and Raspberries reports. In addition, we provided USTR briefings on the distributional effects of trade and multiple other topics. We also provided multiple industry briefings on the Hill: on EV battery supply chains and semiconductors. Feedback from meetings and briefings informed research priorities set under performance goal 2.11.	Post-delivery briefings conducted in FY 2022, including briefings for the Cucumbers and Squash reports and for Foreign Censorship Part 1 and Part 2 reports. In addition, we continued to provide USTR briefings on distributional effects of trade and multiple other topics. Feedback from meetings and briefings informed ongoing factfinding reports and research priorities set under performance goal 2.11.	Met with USTR, HWM and SFC 74 times in FY 2023. Topics included potential factfinding investigations, statutory reports, technical assistance, and other issues. Appropriate actions taken to incorporate input into our research priorities.	Met with USTR, HWM, and SFC 55 times. Topics included potential factfinding investigations, statutory reports, technical assistance and other issues. Appropriate actions were taken to incorporate input into our research priorities.
Status	Target met	Target met	Target met	Target met

Performance indicator: Feedback provided during briefings, meetings, and other engagements; actions taken.

For performance goal 1.22(a), we met our FY 2024 targets. Our staff regularly engaged our requestors to discuss analytical capabilities and priorities, with 55 meetings over the fiscal year. Staff provided briefings on factfinding reports, most notably on Apparel Competitiveness, Greenhouse Emissions Intensities, and Distributional Effects of Trade. Staff and Commissioner aides also met with requestors to discuss areas and topics of interest.

## Performance goal 1.22(b):

Engage non-requestor experts and stakeholders to expand staff expertise, diversify knowledge base, and improve analytical tools to inform and support agency capabilities in factfinding reports

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Engagement with academics, NGOs, industry representatives, and other experts on issues related to trade research and analysis; actions taken, as appropriate.	Engagement with academics, NGOs, industry representatives, and other experts on issues related to trade research and analysis; actions taken, as appropriate.	Engagement with academics, NGOs, industry representatives, and other experts on issues related to trade research and analysis; actions taken, as appropriate.	Engagement with a wide range of academics, NGOs, industry representatives, and other experts on issues related to trade research and analysis; actions taken, as appropriate.	Engagement with a wide range of academics, NGOs, industry representatives, and other experts on issues related to trade research and analysis; updates to ongoing or future work products taken in response to feedback where appropriate.
Results	Engaged with academics, NGOs, and industry representatives on issues related to trade policy modeling and integration in global supply chains	Engaged with academics, NGOs, other government agencies (TPSC, GAO), and industry representatives and international organizations on issues related to trade policy modeling and integration in global supply chains	Engaged with academics, NGOs, other government agencies (ODNI, NSC), and industry representatives on issues related to trade policy modeling, foreign investment drivers, digital trade developments, and integration in global supply chains	Engaged with academics, NGOs, other government agencies (GAO, EPA, DOC), and industry representatives on issues related to trade policy modeling, foreign investment, trade remedies, and integration in global supply chains.	Engaged with a wide range of academics, NGOs, other government agencies, industry representatives, and other experts on trade-related research.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Feedback provided during briefings, meetings, and other engagements; actions taken.

For performance goal 1.22(b), we met our FY 2024 targets. Our staff regularly engaged non-requestors to discuss analytical capabilities and priorities, holding 47 meetings with non-requestor experts and stakeholders.



## Performance goal 1.22(c):

Engage requestors, industry experts, and other key stakeholders by hosting at least one trade issue roundtable as well as at least one additional event each fiscal year

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	At least one roundtable held in FY 2020	At least one roundtable held in FY 2021	At least one roundtable and one additional outreach event held per fiscal year	At least one roundtable and one additional outreach event held per fiscal year	At least one roundtable and one additional outreach event held per fiscal year
Results	Held Services Roundtable	Held Services Roundtable	Held Services Roundtable, modeling symposium, and global value chains symposium	Held both Services Roundtable and Digital Trade Workshop	Held a Services Roundtable and hosted a series of Distributional Effects seminars.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Roundtables held.

For performance goal 1.22(c), we met our FY 2024 targets. The Commission held its annual Services Roundtable in November 2023, and a series of six seminars for the *Distributional Effects* investigation in July and August 2024. These events brought together academic, private sector, and other leading experts and provided the Commission up-to-date information on emerging events and trends.

## Performance goal 1.23:

Collect feedback from stakeholders and/or the public to assess effectiveness and efficiency of investigative processes and procedures and implement proposed new processes/procedures as appropriate

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Assess survey responses and update processes and/or procedures	Surveys issued, responses compiled, and assessed	Based on assessment of survey, update processes and/or procedures	Collect feedback, and assess and modify processes and/or procedures, as appropriate	Collect feedback; assess and modify processes and/or procedures, as appropriate
Results	Features of ongoing Notice of Institution (NOI) portal structure reflects feedback gained from external survey.	External survey issued on the benefits and challenges of virtual hearings and conferences. Responses were assessed and summary was provided to internal stakeholders.	Survey feedback provided to agencywide working group, where appropriate certain feedback was integrated into Commission plans.	Feedback reflected in updates to NOI for import injury investigations, and feedback from surveys regarding witness testimony reported to internal stakeholders and Commissioners for fact-finding investigations.	Collected and assessed survey-based feedback on utility of the Commission's AD/CVD Handbook and on factfinding hearing procedures; discussed additional IDS-related data.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Survey issuance; process/procedure updates.

In FY 2024, we incorporated feedback from the FY 2023 Customs and International Trade Bar Association (CITBA) survey on Qualtrics as we transitioned to using it for investigative questionnaire collection, and continued outreach to import injury mission area stakeholders to discuss investigative processes and procedures. Representatives across Commission import-injury mission offices met with representatives of CITBA to identify and discuss a wide array of areas for feedback and improvement. As a result of these communication efforts, the Commission collected feedback to inform the anticipated update of the Commission's AD/CVD Handbook, as well as additional requested data for IDS. In FY 2024, we worked on implementing improvements to the Commission's online trade database DataWeb to reflect stakeholder feedback collected in FY 2023. We also incorporated feedback from a survey of participants in Commission factfinding hearings to improve our guidance and messaging about the schedule for these events.

## Performance goal 1.24:<sup>4</sup>

Leverage technology to improve efficiency of processes used to collect and provide import injury investigative information

	FY 2021	FY 2022	FY 2023	FY 2024
Target	Continue NOI pilot project; assess and update requirements and process; transition to alternative collection vehicle and process	Continue NOI pilot project; assess and update requirements and process; transition to alternative collection vehicle and process	Continue NOI pilot project; assess and update requirements and process; transition to alternative collection vehicle and process	Assess transition of document collection from Dropbox to Qualtrics; develop requirements for and engage stakeholders on implementation of e-AJ for import injury investigations.
Results	Commission staff developed and tested a portal for collection of information submitted in response to notices of institution. Challenges were presented with interoffice processing and rules. Commission staff will be collaborating with internal stakeholders to address these constraints, where possible.	OINV pivoted from web portal to development and use of an extractable spreadsheet for NOI-responses. Testing and feedback were collected from external parties. Beginning in August 2022, requests for firms to use the electronic form was included in FR notices, and staff was trained on use of the new process.	OINV continued to collect feedback and assess the new data collection vehicle. Modest updates were implemented from external stakeholder feedback. Ongoing monitoring demonstrated successful adoption and use, with more than 93% for last 3 quarters, and more than 98% for last 2 quarters.	FY 2024 completed task: Transition to Qualtrics and decommissioning of Dropbox; developed e-AJ requirements and initial e-AJ structure.
Status	Target partially met	Target met	Target met	Target met

Performance indicator: Number of responses filed; options to reduce reporting burden.

As a result of increasing instability and the need to transition to an off-the-shelf solution, the Commission prioritized the review, development, testing, and launch of an alternative questionnaire collection vehicle. During FY 2024, we created and tested Qualtrics infrastructure for questionnaire collection for various documents. After pilot testing, the new platform was gradually implemented for all investigations and document types. After developing training and process documentation, the Commission was able to effectively decommission the decades-old, internally created Dropbox.

<sup>4</sup> The FY 2020 through FY 2023 goal (Develop and implement an online vehicle and related processes to streamline the collection, analysis, and presentation of responses to notices of institution for sunset/review investigations) was completed. Monitoring of the use of the spreadsheet to collect quantitative information for responses to the Commission's notice of institution for 5-year reviews indicates broad and consistent use. As a result, this performance goal has been updated to more broadly reflect ongoing efforts to leverage technology to manage information dissemination and collection for internal and external stakeholders.

## Performance goal 1.25:

Maintain timeliness of trade remedy assistance information provided in response to emails submitted through the online TRAO help system and telephone calls to the TRAO phone number

	FY 2023	FY 2024
Target	97% of emails received through the TRAO online help system and phone calls to the TRAO phone number receive responses within 3 working days	97% of emails received through the TRAO online help system and phone calls to the TRAO phone number receive responses within 3 working days
Results	100% of TRAO calls and emails responded to within 3 working days.	97.9% of TRAO calls and emails responded to within 3 working days.
Status	Target met	Target met

Performance indicator: Email and telephone responses to trade remedy inquiries.

During FY 2024, TRAO received 13 phone calls through the TRAO phone number and 35 emails through the TRAO email requesting trade remedy assistance. TRAO responded to 47 of the 48 (97.9 percent) requests for information within 3 business days, which met the target. TRAO also responded to numerous requests for trade remedy assistance which were forwarded to TRAO from other Commission offices and government agencies. Overall, TRAO responded to requests for trade remedy assistance from 89 small businesses and individuals during FY 2024. The trade remedy assistance requests covered a variety of subjects, primarily IP infringement/Section 337-related issues, but also questions related to antidumping/countervailing duty investigations, Section 201 (Safeguard) investigations, Section 301 investigations, Customs and Border Protection, HTS, and commercial transaction disputes. TRAO received substantial support in responding to these assistance requests from OUII, OINV, TATA, ICA, and other Commission offices. For questions concerning topics outside the purview of the Commission, TRAO directed the information requestors to the appropriate government agencies/entities.

## Strategic Goal 2

### **Inform: Develop Sound and Informed Analyses and Determinations**

In recent years, changes in the global trading environment have brought new issues to the Commission's investigations and determinations, while policymakers have expanded the complexity and scope of analysis they have requested from the Commission. Policymakers need high-quality information to evaluate complex tradeoffs between competing policy goals and to inform and support their decision making. To fulfill its mission, the Commission must independently provide sound and informed analysis to U.S. policymakers, whether they are engaged in trade negotiations or considering legislation or other trade-related policy actions that affect the U.S. economy and industry competitiveness.

By law, the Commission is responsible for providing advice, analysis, data, and other information to Congress, the President, and, by delegation, the U.S. Trade Representative. In response to U.S. policymakers' requests or upon its own motion, the Commission supplies sound and informed analysis on numerous trade and competitiveness topics. Our unique ability to collect, develop, and synthesize primary information and provide multidisciplinary analyses supports the development of well-informed trade policy. To ensure that we develop and maintain the technical expertise needed to fulfill our statutory responsibilities, we also identify and pursue research on priority issues in international trade, industry competitiveness, and the U.S. and global economies.

The Commission is responsible for administering and applying U.S. laws concerning allegations of subsidized and dumped imports that injure a domestic industry, surges of imports that allegedly injure a domestic industry, and imports that allegedly infringe domestic intellectual property rights or are otherwise unfairly imported. U.S. laws, court decisions, and U.S. international obligations require the Commission to reach its determinations based on transparent procedures and a well-developed record.

In addition, we publish and maintain the Harmonized Tariff Schedule of the United States (HTS), which serves as the basis for collecting customs duties, compiling trade data, and formulating many trade actions. We play a significant role in developing the terminology used worldwide to classify traded goods. We also help U.S. businesses seeking U.S. classification information and guide the development of the statistical categories used to monitor trade. Our staff provides

advice to all involved agencies on the implementation of tariff-related actions under U.S. laws and ensures that such actions are properly reflected in the HTS. Our HTS-related work is vital to U.S. businesses, government agencies, and other stakeholders interested in trade-related activity and that depend upon accurate, current tariff rates and useful trade data.

In FY 2024, we instituted six factfinding investigations and completed seven (Appendix C). Our staff continued to provide significant technical assistance to agency requestors throughout the fiscal year. In FY 2024, we also prepared and published the HTS 10 times to implement tariff actions taken by the U.S. government. This high level of activity is enabled by the agency's continual efforts to maintain and improve its tariff information in digital form.

## **Strategic Objective 2.1**

### **Sound: Apply innovative analysis and make objective determinations<sup>5</sup>**

The Commission applies innovative analysis to address the requests we receive from policymakers that cover growing priorities in global trade, which often have not been evaluated extensively by academics or policy analysts. The requests may involve applying different analytic approaches and cover topics on which there is limited publicly available data. These circumstances require us to continually improve our expertise and enhance our information collection processes, analytical methods, and ways of maintaining and providing information.

The Commission is responsible for ensuring the objectivity of its factfinding investigations. The active and engaged efforts of the agency's staff are necessary to produce objective work products and support expeditious, efficient, and technically sound decisions. Investigations are generally staffed with a multidisciplinary team of analysts, economists, statisticians, and attorneys. The Commission must also develop and maintain expertise to respond quickly and effectively to policymakers and stakeholders. To continually strengthen its technical expertise, the Commission also identifies priority research areas related to new developments in trade, industry competitiveness, and the U.S. and global economies. To accomplish our mission, we must ensure appropriate acquisition of reliable information, development of analytical tools, and investment in human capital.

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<sup>5</sup> The leader for this strategic objective is the Director of the Office of Economics (EC).

The Commission continues to advance data collection and analysis to address the increasing levels of complexity in its investigations and to maintain record integrity essential to reliable and objective determinations. Complexity is driven by evolving industry structures, the appearance of new types of nontariff barriers, investigations involving large numbers of subject countries, new and emerging products and industries, the evolution of international trade agreements, and changes in global supply chain networks.

Statutory and requestor requirements drive our efforts to develop the knowledge and skills needed to anticipate policymakers' priorities, spot emerging international trade trends, and develop or adopt advances in analytical techniques and methods. These efforts include developing new economic models and databases, enhancing analytical skills and tools, examining firm and industry behavior, and finding and acquiring new information resources.

Moreover, policymakers and other members of the trade community rely on us to develop and maintain up-to-date HTS nomenclature information. Accurate tariff information is essential in collecting the correct duties and generating accurate information on U.S. trade flows.

The Commission's strategies for meeting these goals include remaining engaged with policymakers to understand their priorities and to prioritize strategic investment in analytic tools and staff skills based on its analysis of anticipated policy priorities and trade needs.

In FY 2024, we completed reports on a variety of topics in analytically complex investigations, including assessing the flexibilities under the TRIPS agreement for COVID-19 diagnostics and therapeutics and the export competitiveness of foreign apparel producers.

The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

## Performance goal 2.11:

### Enhance capabilities to analyze priority issues in trade and industry competitiveness

	FY 2021	FY 2022	FY 2023	FY 2024
Target	<p>Improved capabilities in priority areas such as:</p> <p><b>1. Expand research on:</b> gravity modeling of trade and trade policy; the effects of the 2020 economic downturn on the U.S. economy; partial equilibrium and sector-specific analysis; impact of trade and trade policy on workers, wages, and inequality; global supply chains; methods to assess industry competitiveness; NTMs affecting goods and services; foreign direct investment; China; and the impact of trade policy uncertainty on trade and investment.</p> <p><b>2. Increase expertise on trade-related agreements and U.S. trade relationships.</b></p>	<p>Enhance capabilities to analyze priority issues such as:</p> <p><b>1. Expand research on:</b> gravity modeling of trade and trade policy; the effects of the 2020 economic downturn on the U.S. economy; partial equilibrium and sector-specific analysis; impact of trade and trade policy on employment, wages, and their distributional effects; global supply chains; methods to assess industry competitiveness; NTMs affecting goods and services; foreign direct investment; China; and trade and climate change/environment.</p> <p><b>2. Deepen expertise on trade agreement provisions, trade-related agreements, and U.S. trade relationships.</b></p>	<p>Prioritize research initiatives within the following areas and advance analytical capabilities for the prioritized initiatives.</p> <p><b>a. Expand research on:</b> modeling of trade and trade policy on the U.S. economy and key sectors; the effects of global economic disruptions and the war in Ukraine; impact of trade and trade policy on employment, wages, and their distributional effects; global supply chains; methods to assess industry competitiveness and market conditions; effects of non-tariff provisions in agreements and non-tariff measures (NTMs) affecting goods and services; foreign direct investment; China; and trade and climate change/environment.</p> <p><b>b. Deepen expertise on trade agreement provisions, trade-related agreements, and U.S. trade relationships.</b></p>	<p>Prioritize research initiatives within the following broad areas and advance analytical capabilities for prioritized initiatives.</p> <p>a. Economic modeling techniques (e.g., gravity, general equilibrium, and sector-specific models)</p> <p>b. Impact of trade on workers and its distributional effects</p> <p>c. Industry competitiveness and market conditions</p> <p>d. Regional and global supply chains and effects of trade disruptions</p> <p>e. NTMs affecting trade in goods and services and foreign direct investment</p> <p>f. Trade and the environment</p> <p>g. Provisions, including non-tariff provisions, in U.S. trade agreements and their effects on U.S. trading relationships</p> <p>h. Emerging topics recommended by requestors</p>
Results	Significant improvements in capabilities in all priority areas	Significant improvements in capabilities in all priority areas	Staff produced 47 total research products in strategically identified priority areas in FY 2023, meeting the target goal.	Staff produced 83 research products in strategically identified priority areas in FY 2024, meeting the target goal
Status	Target met	Target met	Target met	Target met

Performance indicator: Priority areas identified and vetted.

In FY 2024, we continued to upgrade our economic modeling capabilities, in part by working with experts at U.S. universities and leading international institutions, including Drexel University, the University of Wisconsin, and the University of Maryland. These experts contributed to our understanding of priority trade issues. About half of the FY 2024 research services contracts focused on better understanding and estimating the impact of trade on U.S.



workers and U.S. communities. Other issues included dynamic trade models, gravity analysis, and drivers of foreign direct investment.

We have expanded our modeling capabilities to improve the analysis and information provided to our requestors. We have improved the estimation of labor market effects in our trade and trade-policy models, with the goal of better capturing regional effects, worker mobility, and the impacts of labor provisions in trade agreements. We have also improved our capabilities in sector-specific analysis and made numerous models available to the public through our research portals, the working paper series, and factfinding reports.

## Performance goal 2.12:

Incorporate new capabilities and improved analytical tools in statutory work products

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Improved analytical tools and new capabilities are reflected in statutory work products	Improved analytical tools and new capabilities are reflected in statutory work products	70% of capacity-building research is reflected in statutory work products	70% of capacity-building research is reflected in statutory work products	70% of capacity-building research is reflected in statutory work products within 3 years
Results	Over 70% of the strategic research generated in 2017 was used in statutory work products by 2020.	Over 70% of the strategic research generated in 2018 was used in statutory work products by 2021.	Over 80% of the strategic research generated in 2019 was used in statutory work products by 2022.	Over 80% of the strategic research generated in 2020 was used in statutory work products by 2023	Over 80% of the strategic research generated in 2021 was used in statutory work products by 2024
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Share of staff research time reflected in statutory products.

Over eighty percent of staff time spent on research in FY 2021 was devoted to topics that were incorporated into one or more statutory products by the end of FY 2024. Since 2021, our factfinding reports have made frequent use of staff research into global supply chains, sector-specific modeling, the competitiveness of U.S. and foreign suppliers, and the effects of trade on workers in the United States.

## **Strategic Objective 2.2**

### **Informed: Provide clear, relevant, and accurate information in Commission work product<sup>6</sup>**

To fulfill its mission, the Commission must provide clear, relevant, and accurate information and analysis to its requestors and stakeholders in a timely manner. Clear and accurate information in Commission work product underpins the Commission's reputation as an objective and unbiased adjudicator of import injury and unfair import proceedings and a reliable, objective, and nonpartisan provider of advice, analysis, data, and other information to the Congress, the President, and USTR. The Commission's specialized ability and multidisciplinary approach to synthesize primary data and information, identify relevant information, and present it clearly and accurately supports the development of well-informed trade policy.

The Commission continually seeks to improve public access to Commission documents and statistical information and the underlying data that support its products, subject to legal requirements to protect proprietary and confidential information. Its efforts to provide public access to underlying data and information contribute to greater transparency and understanding of Commission work product. The Commission has also developed and deployed a public searchable database that compiles and tracks information concerning Commission investigations including import injury, unfair import, and factfinding investigations. The Commission continues to explore how to improve data presentations and dynamically link data presentations to live data when practicable, and maintain and improve the Commission's online trade database (DataWeb). The Commission continues to increase accessibility of work product through compliance with Section 508 of the Rehabilitation Act of 1973.

Under its statutory mandate, the Commission publishes and maintains the Harmonized Tariff Schedule of the United States (HTS), which is a system used to classify imported goods and serves as the legal basis for the collection of customs duties and the compilation of trade data. The HTS provides critical product-specific information for the public and serves as an integral part of other government agencies' work. As the agency responsible for maintaining the HTS, the Commission plays a significant role in drafting and updating both national and international

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<sup>6</sup> The leader for this strategic objective is the Director of the Office of Industry and Competitiveness Analysis (ICA).

nomenclature and guiding the development of the statistical reporting numbers used to monitor trade.<sup>7</sup>

The Commission strategies for meeting these goals include continuously assessing the accuracy and accessibility of Commission products and information as well as identifying tools and distribution strategies to enhance these products. The performance goals for this strategic objective are set forth in tabular form and then described below.

### Performance goal 2.21:

Improve utility of tariff and trade information for requestors and the public by developing and producing digital and dynamic Commission products

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	One additional new or updated digital or interactive Commission product available to requestors and the public	One additional new or updated digital or interactive Commission product available to requestors and the public	At least one new or updated digital or interactive Commission product available to requestors and the public	At least one new or updated digital or interactive Commission product available to requestors and the public	At least one new or updated digital or dynamic Commission data product available to requestors and the public
Results	Enhanced interactive graphics were published for <i>Trade Shifts 2019</i> , <i>Recent Trends in U.S. Services Trade</i> , <i>Year in Trade 2019</i> , and <i>MTB Effects</i> investigations	Enhanced interactive graphics were published for <i>Recent Trends in U.S. Services Trade 2021</i> , <i>Raspberries for Processing</i> , and <i>Year in Trade 2020</i> .	Enhanced interactive graphics were published for <i>Trade Shifts 2021</i> , <i>Recent Trends in U.S. Services Trade 2022</i> , and <i>Year in Trade 2021</i>	Enhanced interactive graphics were published for two factfinding investigations: <i>Trade Shifts 2022</i> and <i>Recent Trends in U.S. Services Trade 2023</i>	Enhanced the use of interactive graphics for the 2024 <i>Year in Trade</i> publication.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: New digital or interactive Commission product produced for requestors and the public.

For FY 2024, the Commission developed updated interactive digital products for the *Year in Trade* publication and the *Recent Trends in U.S. Services Trade 2024 Annual Report*. These interactive products allow the public to customize data presentations on trade topics such as source and destination markets for sectoral imports and exports.

<sup>7</sup> Improving HTS search and HTS data management is addressed in greater detail in performance goals 3.42, 3.43, and 3.44, from the perspective of data integrity, management, and governance.

## Performance goal 2.22:

Improve the accessibility and clarity of Commission factfinding investigations by providing underlying data and models when appropriate

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Publish non-proprietary input data that underlie Commission estimates in factfinding investigations completed in FY 2020	Publish non-proprietary input data that underlie Commission estimates in factfinding investigations completed in FY 2021	Publish non-proprietary input data and source code that underlie Commission factfinding investigations completed in the fiscal year, for all investigations for which disclosure is appropriate	Publish non-proprietary and non-confidential input data and source code that underlie Commission factfinding investigations completed in the fiscal year, for all investigations for which disclosure is appropriate	Publish non-proprietary and non-confidential input data and source code that underlie Commission factfinding investigations completed in the fiscal year, for all investigations for which disclosure is appropriate
Results	Published non-proprietary input data for several investigations including Inv. 332-571 (Sub-Saharan Africa); Inv. 332-565 (AMCA); Inv. 332-576 (COVID-19)	Published non-proprietary input data for several investigations including: 332-574 (Renewable Electricity); 332-575 (Seafood Obtained via Illegal, Unreported, and Unregulated Fishing); 332-577 (Raspberries for Processing); TPA-105-005 (Economic Impact of Trade Agreements Implemented Under Trade Authorities Procedures); and 332-227 (CBERA)	Published non-proprietary data for Inv. 332-584 (Squash) and Inv. 332-583 (Cucumbers)	Investigations 332-591 (Tariff Effects) and 332-595 (CBERA) had model/data releases in FY 2023, meeting the target goal set for the fiscal year.	Published non-proprietary data for Inv. 163-003 Year in Trade as well as Inv. No. 332-601 Recent Trends 2024.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Information posted to the Commission's website.

During FY 2024, the Commission made available underlying data from two investigations: *The Year in Trade: Operation of the Trade Agreements Program, 75<sup>th</sup> Report*; Inv. No. 163-003 and *Recent Trends in U.S. Services Trade, May 2024*; Inv. No. 332-601. As data used in the reports were non-proprietary, the Commission provided datasets that enable the user to replicate all model results in these two reports.

## Performance goal 2.23:

### Improve 508 compliance of Commission information

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Continue to develop templates or processes for additional types of public documents; Use templates developed in FY 2019 to produce a wider range of 508 compliant documents	Continue to develop templates or processes for additional types of public documents; Use templates developed in FY 2020 to produce a wider range of 508 compliant documents	Continue to develop templates or processes for additional types of public documents; use templates developed in FY 2020 to produce a wider range of 508 compliant documents	Inventory remaining types of documents that are not 508 compliant to prioritize for compliance to improve accessibility.	Prioritize inventory for developing templates and processes to transition to 508 compliant documents and expand 508 compliance to additional documents.
Results	All published factfinding investigations, staff working papers, JICE articles, and administrative reports were 508-compliant; Although Commission staff made progress in meeting 508 compliance for Title VII investigation documents, historically high statutory workload levels, constrained staffing, and the effort required to adjust processes to accommodate fulltime telework made it difficult to fully meet this performance goal.	All published factfinding investigations, staff working papers, JICE articles, and administrative reports were 508-compliant. Commission reports for Title VII investigations included 508 compliant formatting, text, and tables.	All published factfinding investigations, staff working papers, JICE articles, and administrative reports remain 508 compliant. Commission reports for Title VII investigations included 508 compliant formatting, text, and tables.	All published factfinding investigations, staff working papers, JICE articles, and administrative reports remain 508 compliant. USITC reports for Title VII investigations included 508 compliant formatting, text, and tables. Each USITC office compiled an inventory of document types not yet 508 compliant.	All published factfinding investigations, staff working papers, JICE articles, and administrative reports remain 508 compliant. USITC reports for Title VII investigations included 508 compliant formatting, text, and tables. Additionally, templates managed by the Office of Tariff Affairs and Trade Agreements were updated in 2024.
Status	Target partially met	Target met	Target met	Target met	Target met

Performance indicators: USITC.gov content analysis report and number of templates created for 508 conversions.

In FY 2024, we continued to publish 508-compliant factfinding reports as well as various staff publications. In addition, other non-investigative agency publications such as certain staff working papers were 508-compliant. The Commission continued its efforts to increase the accessibility of its written materials by making 508 compliant templates managed by the Office of Tariff Affairs and Trade Agreements. These templates were used to make certain internal documents (e.g., meeting agendas, meeting notes, and desk procedures) 508 compliant. TATA

did this as a training/proving ground to do what they are doing now—working on ensuring templates they use for their 1205 report are 508 compliant.

## Performance goal 2.24:

Improve the accuracy of published version of the HTS

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	HTS updates are at least 98% error-free on publication	HTS updates are at least 98% error-free on publication	HTS updates are at least 98% error-free on publication	HTS updates are at least 98% error-free on publication	HTS updates are at least 98% error-free on publication
Results	15,148 total cumulative changes made to the HTS in 31 publications during the fiscal year, with 27 post-publication errors. Accuracy rate for FY 2020 is 99.8%	4,318 total cumulative changes made to the HTS in 18 publications during the fiscal year, with 11 post-production errors. Accuracy rate for FY 2021 is 99.7%	7,344 total cumulative changes made to the HTS in 17 publications, with 30 post-productions errors. Accuracy rate for FY 2022 is 99.6%	2,402 total cumulative changes made to the HTS in 14 publications, with 24 post-production errors. Accuracy rate for FY 2023 is 99.0%	1,847 total cumulative changes made to the HTS in 10 publications, with 10 post-production errors. Accuracy rate for FY 2024 is 99.5%
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Identified and corrected information.

We have used the HTS Data Management System (DMS) to produce all updates of the HTS since FY 2016. Given the continued high number of HTS revisions, this goal is critical to maintaining high-quality data for public and private users, and will be continued in FY 2025 and 2026. In FY 2024, we prepared and published the HTS 10 times to implement multiple tariff changes.

## Performance goal 2.25:

Improve timeliness of tariff and customs information provided in response to emails submitted through online help system

	FY 2020	FY 2021	FY 2022	FY 2023	2024
Target	97% of emails received through online help and search systems receive responses within 7 working days	97% of emails received through online help and search systems receive responses within 7 working days	97% of emails received through online help and search systems receive responses within 7 working days	97% of emails received through online help and search systems receive responses within 7 working days	97% of emails received through online help and search systems receive responses within 7 working days
Results	For this year, 1,791 of 1,862 (96.2%) responses were within the target range.	For FY 2021, 1,280 of 1,323 (96.7%) responses were within the target date range.	For FY 2022, 1,129 of 1,155 (97.7%) responses were within the target date range.	For FY 2023, 1,602 out of 1,638 (97.8%) responses were within the target date range.	For FY 2024, 2,290 out of 2,298 (99.7%) responses were within the target date range
Status	Target not met	Target not met	Target met	Target met	Target met

Performance indicator: Email responses to HTS inquiries.

In FY 2024, Commission staff produced 10 HTS publications to reflect trade actions with respect to, inter alia, modifications to section 301 duties on articles of China resulting from USTR's four-year review of the section 301 investigation of China, granting exclusions to the section 301 duties on articles of China, modifications to Section 232 duties on steel and aluminum products, technical updates to the KORUS rules of origin, modification of the quota limit on CSPV cells under the Section 201 solar cells action, and extension of the suspension of Section 232 duties on steel and steel derivative products from Ukraine, and to make changes to reflect 484(f) Committee decisions. Despite this high tariff-related workload for the Commission, this goal was met (99.7 percent result).

## Strategic Goal 3

### Perform: Execute and Advance Organizational Excellence

The Commission is committed to continuous process improvement and support for the agency's strategic goals and mission. The five strategic objectives described below support our strategic goal of executing and advancing our mission by achieving organizational excellence. The objectives focus on: human resources; budget, acquisitions, and finance; information technology; data; and organizational effectiveness.

#### Strategic Objective 3.1

##### People: Attract, develop, and retain a skilled, diverse, and versatile workforce<sup>8</sup>

To carry out our mission in a constantly evolving business environment, we must recruit, develop, and retain a diverse and versatile workforce sufficient in number to meet the demands of our increasing workload. Efficiency and effectiveness in all human capital management practices are vital to our ability to position ourselves as an attractive employer in a highly competitive labor market. Completing timely hiring actions, providing training and professional development opportunities, fostering an inclusive workplace, and maximizing stakeholder satisfaction with human capital management practices contribute to optimal efficiency and effectiveness. The Commission regularly seeks feedback from its requestors, stakeholders, and employees on various aspects of its operations, including through the Federal Employee Viewpoint Survey (FEVS).

These performance goals include (1) assessing employee global satisfaction and engagement and identifying key gaps in both areas within the Commission, (2) ensuring that recruitment actions are accomplished in an efficient and effective manner, (3) assessing employee satisfaction with career development opportunities, and (4) sponsoring selected employees for participation in a variety of development programs.

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<sup>8</sup> The leader for this strategic objective is the Chief Human Capital Officer (CHCO).



The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

### Performance goal 3.11:

Maintain or improve general employee satisfaction, engagement, and satisfaction with DEIA efforts at the Commission

FY 2024	
Target	Maintain or improve employee satisfaction, engagement, and satisfaction with DEIA efforts at the Commission
Results	Ongoing
Status	Ongoing

Performance indicator: FEVS results related to satisfaction, employee engagement, and DEIA. Actions taken to maintain or improve FEVS results.

### Performance goal 3.11(a):

Maintain employee engagement and satisfaction at the Commission

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Maintain FY 2019 results	Maintain FY 2019 results	Set baseline based on results	Maintain or improve over FY 2022 baseline	Maintain or improve over FY 2023 results
Results	Global Satisfaction Index 2020 = -1.11pp below FY 2019 Employee Engagement Index 2020 = +1.27pp over FY 2019	N/A- FY 2021 FEVS not deployed until November 2021	Global Satisfaction Index Baseline = 71% Employee Engagement Index Baseline = 81.3%	Global Satisfaction Index = 69.6% Employee Engagement Index = 79.2%	Global Satisfaction Index = 70.8% Employee Engagement Index = 81.9%
Status	Target partially met	N/A	Target met	Target not met	Target met

Performance indicator: FEVS results related to global satisfaction and employee engagement.

Note: Prior to FY 2020, the goal was “Improve agency results in specific areas measured in the FEVS.”

The increase in employee satisfaction and employee engagement compared to FY 2023 is at least partially attributable to the Commission’s continued hiring surge throughout FY 2024. The Commission began FY 2024 with 411 employees on board and ended with 425. On-board levels were further bolstered by the strategic use of temporary appointment employees and volunteers to add value in critical areas through the year, in an attempt to offset high workload and insufficient staffing in some areas.

### Performance goal 3.11(b):

Improve workforce satisfaction of the Commission’s ongoing initiatives and efforts to promote and advance diversity, equity, and inclusion in the workplace

	FY 2023	FY 2024
Target	Baseline established and initial priorities set.	Priorities set annually
Results	80%	The Commission was able to improve employee satisfaction on the DEIA Index. Employee satisfaction on the Equity sub-index increased significantly, while satisfaction on the Accessibility sub-index declined slightly.  Overall: 80.3% (+1.2pp) Diversity: 82.1% (+1.4pp) Equity: 77.4% (+4.3pp) Inclusion: 85.3% (+0.7pp) Accessibility: 76.5% (-1.6pp)
Status	Target met	Target partially met

Performance indicator: FEVS results related to DEIA.

In FY 2023, the Commission established a baseline for workforce satisfaction regarding its efforts to promote and advance diversity, equity, and inclusion in the workplace by adopting the results of the Office of Personnel Management’s Diversity, Equity, Inclusion, and Accessibility (DEIA) Overall Index. The FY 2023 positive response rate among Commission employees for this index is 80. For FY 2024, the Commission prioritized improvement to the Accessibility subindex score of the DEIA index. Specifically, to address this subindex, this year the Office of Human Resources began work on a new policy on Reasonable Accommodations (RA) and hired a dedicated Employee Relations Specialist to, among other things, expedite processing of RA and medical telework requests. Despite these efforts, the positive response rate decreased slightly for the Accessibility subindex, though the Commission experienced increases in other subindices for an overall improvement in the DEIA index. In FY 2025 the Commission intends to continue its work by reviewing its accessibility policies and procedures and have internal stakeholder discussions to better understand how to improve accessibility for staff.

### Performance goal 3.12:

Increase stakeholder satisfaction with the extent to which recruiting efforts bring in the right human capital in an efficient way

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Improvement over FY 2019 average in rate of positive responses to FEVS questions, or, if 2019 results indicate widespread satisfaction, maintain 2019 satisfaction level	Maintain FY 2019 Results	Set baseline based on results	Improvement over FY 2022 results	Improvement over FY 2023 results
Results	Due to the change in questions on the 2020 FEVS, only one of the three questions comprising the Hiring Practices Index was asked. The positive response rate improved by 3pp for that question.	N/A- FY 2021 FEVS not deployed until November 2021	Baseline established: 83.3%	84.3% positive response rate	86% positive response rate.
Status	Target partially met	N/A	Target met	Target met	Target met

Performance indicators: FEVS results satisfaction with the extent to which recruiting efforts bring in the right human capital in an efficient way.

In FY 2024, workforce satisfaction with hiring practices improved by 1.7 percentage points over FY 2023 to 84.3 percent. The Commission attributes this increase in satisfaction to the efforts that were made to increase staffing levels agency-wide in FY 2024. OAS will continue to work with management and staff to determine how best to identify, understand, and address issues with satisfaction with the extent to which recruiting efforts bring in the right human capital in an efficient way.

## Performance goal 3.13:

Ensure efficiency and effectiveness of all hiring actions

	FY 2022	FY 2023	FY 2024
Target	Meet 80% of overall Service Level Agreements (SLA)	Improvement over FY 2022	Improvement over FY 2023 results
Results	During FY 2022, there were 37 recruitment actions and at least 80% of the SLAs were met.	During FY 2023, there were 56 recruitment actions for which 85% of SLAs were met.	During FY 2024, there were 62 recruitment actions for which 20% of SLAs were met.
Status	Target met	Target met	Target not met*

Performance indicator: Signed service level agreement forms.

\* In FY 2024, HR shifted to shorter standardized SLA timeframes for all hiring actions, which resulted in a change to how this result was calculated.

Though the Commission was able to add a significant number of additional employees during FY 2024, the recruitment process faced a number of challenges. At this time, it is unclear where the primary problems in the recruitment process reside, but the recruitment tracking application implemented during FY 2024 has begun to provide the kind and quality of data required to perform that analysis.

### Performance goal 3.14:

Improve stakeholder satisfaction regarding opportunities for professional development to help retain human capital

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Improvement over FY 2019 average in rate of positive responses to FEVS questions, or, if 2019 result indicates widespread satisfaction, maintain 2019 satisfaction level	Maintain 2019 satisfaction level	Set baseline based on results	Improvement over FY 2022 results	Improvement over FY 2023 results
Results	Due to the change in questions on the 2020 FEVS, only two of the six questions composing the Career Development Opportunities Index were asked. The average positive response rate improved by 0.41% for those two questions.	N/A- FY 2021 FEVS not deployed until November 2021	Baseline established: 80.8%	80.5% (-0.3pp)	83.3 (+2.8pp)
Status	Target partially met	N/A- FY 2021 FEVS not deployed until November 2021	Target met	Target not met	Target met

Performance indicator: FEVS results related to professional development.

In FY 2024, the positive response rate for employee satisfaction with opportunities for professional development improved by 2.8 percentage points over the FY 2023 baseline. This year the Commission continued to provide numerous opportunities for competitive details and sponsored employees at different levels within the agency to participate in leadership training programs. As part of its annual FEVS action planning, OAS will continue to work with management and staff to determine how best to identify, understand, and address issues with satisfaction regarding opportunities for professional development to help retain human capital. In FY 2025, OHR will also restart the Commission’s mentoring program.

**Performance goal 3.15:**

Foster an inclusive workplace environment by promoting transparency and fair criteria for training and development opportunities

FY 2024	
Target	Continuously improve training and development opportunities
Results	Ongoing
Status	Ongoing

## Performance goal 3.15(a):

### Identify and implement developmental details within the Commission

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Provide opportunities for staff across the agency to apply for details	Provide opportunities for staff across the agency to apply for details	Provide at least 2 competitive opportunities for staff across the agency to apply for developmental details.	Provide at least 2 competitive opportunities for staff across the agency to apply for developmental details.	Provide at least 2 competitive opportunities for staff across the agency to apply for developmental details.
Results	5 internal detail opportunities within the Commission were provided during FY 2020. 2 USITC employees selected for detail to Commissioner offices. 3 USITC employees selected for detail to the Office of Economics.	11 total detail opportunities. The Commission provided 10 internal and one external detail. 2 USITC employees selected for details to the commissioners' offices. Other internal details include Inspector General (2); Economics (3); OPs front office (1); OGC (1); and ALJ (1)	The Commission provided 14 internal and two external developmental detail opportunities. Of the 16 total detail opportunities, 4 offices offered 6 competitive details, meeting this performance goal. There were 6 competitive internal details in the following offices: a Commissioner's office (1), in the front office of the Office of Operations (1), in the Office of Economics (1), and in the Office of the Secretary (3).	The Commission provided 19 internal details, 6 of which were competitive. There were 6 competitive internal details in the following offices: in the Office of the Secretary (1), in the Office of Operations – Front Office (2), and in the Office of External Relations (3).	There was a total of 9 internal details for the performance year, all were competitive.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Number of Commission project-based or rotational/development details.

To provide employees with firsthand experience and knowledge of roles different than their own, the Commission promotes internal detail opportunities. These opportunities provide employees the ability to experience new perspectives and innovative approaches that are brought back when they return to their primary roles. To that end,

in FY 2024, the Commission sponsored 9 internal detail opportunities, all of which were competitive.

**Performance goal 3.15(b):**

Sponsor and promote through transparent and fair criteria, opportunities for Commission staff to participate in a variety of leadership development programs

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Sponsor at least three individuals at the Commission in FY 2020	Sponsor at least three individuals at the Commission in FY 2021	Sponsor at least three individuals at the Commission in FY 2022	Sponsor at least three individuals at the Commission in FY 2023	Sponsor at least 3 individuals at the Commission in FY 2024
Results	20 employees sponsored: 6 started the Executive Potential Program at the Graduate School; 2 attended two-day leadership course sponsored by the SAC; 3 selected for the GS 7-11 New Leader Program at the Graduate School; 4 selected for executive coaching; 3 selected (1 recalled) for the Executive Leadership Program; 2 selected for the International Career Development Program	8 employees sponsored for leadership programs. 2 selected for Leadership and Management for Non-Managers and Aspiring Supervisors; 1 employee selected for New Leader Program at Graduate School; 1 employee selected for Executive Leadership Program at Graduate School; 3 employees selected for Executive Leadership Program; Additionally, USITC sponsored a candidate for the International Career Advancement Program.	7 employees sponsored for leadership programs. 5 selected for leadership coaching; 2 selected for the International Career Advancement Program.	2 employees sponsored for leadership programs. 2 selected for International Career Advancement Program. 17 mentoring matches.	8 employees sponsored for leadership programs. 2 employees selected for International Career Advancement Program
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Number of individuals sponsored by the Commission.

To develop and support leaders and future leaders, the Commission promotes professional development and training opportunities. These opportunities allow employees to develop new skills and learn innovative leadership approaches to support mission accomplishment. To that end, in FY 2024 the Commission sponsored two staff to participate in the ICAP program and eight staff to participate in upcoming executive leadership programs.



### Performance goal 3.16:

Improve stakeholder satisfaction regarding the performance management process

	FY 2023	FY 2024
Target	Set baseline based upon FY 2023 FEVS results	Maintain or improve upon FY 2023 baseline
Results	Baseline: 84.9%*	Certain questions changed between the FY 2023 and FY 2024 administrations of the FEVS. Of the questions remaining relevant to this USITC-chosen baseline, the positive response rate was <b>83.4%</b> in 2023. Comparing the positive response rate for these questions in FY 2024, the positive response rate is <b>84.4%</b> (+1pp).
Status	Target met	Target met

Performance indicator: FEVS results related to performance management.

In FY 2023, the Commission identified questions on the FEVS that are most probative to assess workforce satisfaction with performance management practices. Some of the questions chosen changed between the FY 2023 and FY 2024 administrations of the FEVS, leaving 28 questions to compose this index. The positive response rate for the remaining questions improved by 1 percentage point. In FY 2024, the PMSPC performed a strategic review of the Commission’s performance management system for General Schedule employees to determine whether the system has been efficiently implemented and carried out to achieve its intended goals. In the coming year, the HCC will work with internal stakeholders to evaluate and begin implementing recommendations from that review to continue improving stakeholder satisfaction.

### Performance goal 3.17:

Improve stakeholder satisfaction regarding employee recognition

	FY 2023	FY 2024
Target	Set baseline based upon FY 2023 FEVS results	Maintain or improve upon FY 2023 baseline
Results	Baseline: 70.5%	73.5% (+3pp)
Status	Target met	Target met

Performance indicator: FEVS results related to recognition.

In FY 2023, the Commission identified questions on the FEVS that are most probative to assess workforce satisfaction with employee recognition. In FY 2024, the positive response rate improved by 3 percentage points for this index. In FY 2025, the PMSPC will be performing a strategic review of the agency’s awards program to, among other objectives, identify ways to continue improving employee satisfaction in this area.

## Performance goal 3.18:

Improve stakeholder satisfaction regarding the reasonableness of workload

	FY 2023	FY 2024
Target	Set baseline based upon FY 2023 FEVS results	Maintain or improve upon FY 2023 baseline
Results	Baseline: 74.4%	73.7% (-0.7pp)
Status	Target met	Target not met

Performance indicator: FEVS results related to workload.

In FY 2023, the Commission identified questions on the FEVS that are most probative to assess workforce satisfaction with employee workload. In FY 2024, the positive response rate decreased in this area for this index, indicating that, despite increases in staffing and overall improvements in engagement and satisfaction, about a quarter of Commission staff continue to perceive their workload as unreasonable. This year, the Commission added two agency-specific items on the FEVS regarding employee perceptions on the drivers of workload to identify other potential interventions to help improve employee satisfaction in this area. In FY 2025, OAS will analyze data from these questions and present findings and recommendations to the HCC.

## Strategic Objective 3.2

### Money: Ensure good stewardship of taxpayer funds<sup>9</sup>

Financial oversight and stewardship of appropriated funds are fundamental to the accountability and transparency that taxpayers demand. Current and past administrations have directed federal agencies to improve their efforts in this area, to improve data management, and to deliver more and higher-quality services. To accomplish these objectives, we have created four performance goals: (1) assess the Commission’s financial management operations, (2) maintain the efficiency and effectiveness of the acquisition process, (3) maintain an annual unmodified audit opinion on our financial statements, and (4) continually improve the budget process.

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<sup>9</sup> The leader for this strategic objective is the Chief Financial Officer (CFO).

The strategies to achieve these performance goals are as follows:

- Evaluate the structure of the Office of the Chief Financial Officer, and its systems (accounting, procurement, budget, and travel), practices, policies, and providers to determine if they are suited to meet the current and future needs of the Commission.
- Review our contract award processes and contract files on a monthly basis to ensure that the Office of Procurement’s acquisition process meets the needs of its customers in a timely way; the files are accurate and complete; the Commission’s Contracting Officer’s Representatives are properly trained and are faithfully carrying out their duties; and we transition from paper to electronic files.
- Ensure that financial controls are documented, implemented, reviewed, and refined on a regular basis in order to maintain an annual unmodified financial audit opinion, and to ensure DATA Act reporting is timely and accurate.
- Require managers to tie budget requests for personnel and non-personnel funding to projected workloads and provide linkage to performance planning.

The four goals described above and reflected in the tabular presentations below demonstrate our commitment to provide good stewardship of taxpayer funds.

During FY 2024, the Office of the Chief Financial Officer (OCFO) met all performance goals while actively expanding and improving its financial management practices and reporting capabilities. A critical accomplishment this year was the completion of a comprehensive evaluation of Shared Service Providers (SSPs). The evaluation involved assessing multiple federal SSPs based on key criteria, including service offerings, pricing, implementation timelines, and long-term sustainability. This rigorous review followed the Modernization and Migration Management (M3) Framework, a government-wide standard established to guide agencies through shared service migrations effectively.

The M3 Framework provided a structured, phased approach to assess readiness, evaluate alternatives, and engage systematically with potential providers. It emphasized governance, risk mitigation, and measurable outcomes, enabling the Commission to make informed decisions. By leveraging the M3 Framework, the OCFO identified the Department of the Treasury’s Administrative Resource Center (ARC) as the provider best suited to meet the Commission’s needs.

The goal of tying budget requests to projected workloads was again met and further expanded. This year, the Commission developed an approved hiring plan directly informed by workload analysis, demonstrating a proactive approach to aligning resources with operational demands. The Office of Budget played a pivotal role by leveraging its enhanced Budget Object Class (BOC) review process to ensure adherence to Office of Management and Budget (OMB) guidance and compliance with the Digital Accountability and Transparency Act (DATA Act). This process improved the agency's ability to track expenditures accurately and transparently.

Additionally, the Office of Budget enhanced the Commission's reporting tool, making it more user-friendly for managers to plan and execute budgets effectively. This enhancement allowed for more strategic financial decision-making across the Commission. As in prior years, the Office of Budget worked closely with all offices to ensure that the expenditure plan was executed accurately, and that funding was made available when needed to support the agency's mission-critical functions.

The Office of Procurement continued to prioritize efficiency and customer satisfaction. Quarterly reviews of contract activity assessed the extent to which established Procurement Action Lead Times (PALT) deadlines were met, identifying opportunities to streamline processes. Weekly status reports provided transparency on outstanding procurement requests, while customer satisfaction surveys offered insights into areas for improvement. Contracting Officer's Representatives (CORs) received training, and COR file reviews ensured compliance with procurement regulations. These measures collectively enhanced the agency's procurement processes, making them more responsive and effective.

The Office of Finance sustained its focus on strengthening internal controls. Quarterly reviews, documentation, and testing of accounting processes ensured that key financial controls were effectively identified and functioning as intended. These efforts were instrumental in securing the Commission's 14th consecutive unmodified financial audit opinion, reflecting the agency's commitment to financial accuracy, transparency, and accountability.

By continuously improving processes, modernizing systems, and aligning financial management practices with the agency's strategic goals, the OCFO ensures that the Commission remains a model of fiscal responsibility. Through the adoption of modern frameworks such as M3, the migration to ARC, and proactive resource management, the Commission demonstrates its readiness to meet current challenges and seize future opportunities. These efforts uphold the highest standards of financial stewardship and prepare the agency for a more efficient and effective operational future.

## Performance goal 3.21:

Analyze current OCFO structure, compare it to similarly sized agencies, investigate and evaluate system offerings, review Commission policies, and align the foregoing with the operational needs and budgetary realities of the Commission

	FY 2022	FY 2023	FY 2024
Target	Analyze current OCFO structure, compare to similar sized agencies, investigate and evaluate system offerings, review Commission policies, and align the foregoing with the operational needs and budgetary realities of the Commission	Continue to analyze existing OCFO office structure, systems, practices, and policies, and reach out to similarly sized agencies and existing government-wide councils and committees to identify best practices and determine what changes, if any, are needed to meet the needs of the Commission, and draw up change plans as appropriate	Finalize analysis and begin to execute change plan within confines of budget
Results	Structural and process analysis completed.	The OCFO had further discussions with federal shared service providers to discuss product and service offerings, pricing, availability, and timing. Given the upcoming retirements in the OCFO, no agreements to change in the OCFO's SSP or its service levels were contracted for.	During the period the OCFO continued its discussions with, and evaluations of, federal shared service providers and chose ARC as its SSP. The OCFO contracted for the Engagement and the Migration phases of the project and the expected go live date with ARC is October 1, 2025.
Status	Target partially met	Target partially met	Target met

Performance indicator: Report our results of research and analysis, recommend changes and timelines by established deadlines, and begin to execute plans.

During FY 2024, the Office of the Chief Financial Officer (OCFO) conducted a comprehensive analysis of its current structure, comparing it to similarly sized agencies, and aligning this evaluation with the operational needs and budgetary realities of the Commission. This analysis included a detailed review of Commission policies, workforce capabilities, and existing financial management processes to identify opportunities for modernization and increased efficiency.

A key component of this effort was the investigation and evaluation of system offerings from federal SSPs. The OCFO assessed multiple SSPs, focusing on critical factors such as product and service capabilities, pricing structures, implementation timelines, and long-term support. Following this extensive review, ARC was identified as the provider best suited to meet the Commission's financial management and operational needs.

With the Commission's approval of the recommendation, the OCFO initiated the transition process, finalizing agreements for both the Engagement and Migration phases of the project. The Engagement phase, scheduled to conclude in December 2024, focuses on planning, system readiness assessments, and establishing governance frameworks. The Migration phase will commence in January 2025 and is set to conclude on September 30, 2025, preparing the Commission for a successful go-live date with ARC on October 1, 2025.

This transition effort reflects the OCFO’s commitment to aligning its operations with best practices in financial management and addressing the Commission’s evolving operational needs within budgetary constraints. By leveraging insights from its structural analysis and comparative agency evaluations, the OCFO ensures that this modernization effort will enhance efficiency, transparency, and compliance while supporting the Commission’s strategic goals.

### Performance goal 3.22:

Maintain a high level of acquisition effectiveness and efficiency

FY 2024	
Target	Monthly reviews of key elements of the acquisition process and contract award data
Results	Pending
Status	Pending

Performance indicators: Timeliness and accuracy of procurement actions; customer feedback.

### Performance goal 3.22(a):

Maintain high-level targets of procurement actions meeting the Procurement Action Lead Time (PALT)

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Quarterly PALT reviews show that 97% of procurement actions met the PALT in FY 2020	Quarterly PALT reviews show that 97% of procurement actions met the PALT in FY 2021	Quarterly PALT reviews show that 97% of procurement actions meet the PALT	Quarterly PALT reviews show that 95% of procurement actions meet the PALT	Quarterly PALT reviews show that 95% of procurement actions meet the PALT
Results	92.9% of actions met the PALT	90.3% of actions met the PALT	93.2% of actions met the PALT	96.7% of actions met the PALT	96.9% of actions met the PALT
Status	Target not met	Target not met	Target not met	Target met	Target met

Performance indicator: Share of procurement actions that meet the PALT.

The Fiscal Year 2024 target goal of 95 percent for meeting the Procurement Action Lead Times (PALT) was successfully achieved, with 96.9 percent of procurement actions completed within the established PALT. This marks the second consecutive year that the OCFO has met this critical performance metric and reflects the highest success rate since the goal was established.

### Performance goal 3.22(b):<sup>10</sup>

Ensure accuracy, completeness, and timeliness of contract award data

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Maintain or improve satisfaction level relative to FY 2019	Maintain or improve satisfaction level relative to FY 2020	Maintain or improve satisfaction level relative to FY 2021	Maintain or improve satisfaction level relative to FY 2022	Maintain or improve satisfaction level relative to FY 2023
Results	Continued improvement, as the % of respondents indicating they strongly agreed, agreed, were neutral, or disagreed when asked if they were satisfied with the procurement process improved from 88/11/1/0 in FY 2019 to 95/5/0/0 in FY 2020	The 2021 survey again returned very positive results, with a marginally better response rate in 2021 (44%) than in 2020 (39%). Seventy-five to one hundred percent of the respondents were very satisfied with the different measures of the procurement process, such as technical knowledge, professionalism, problem solving, and availability, while the remaining respondents were satisfied. Approximately 90% were very satisfied with the process overall.	Slightly increased from 2021, 79% to 100% of respondents were very satisfied with the different measures presented in the survey, and the remaining respondents were satisfied.	Marginally lower than the FY 2022 results. Overall, 80% of the respondents strongly agreed that the procurement staff exhibited the technical knowledge, availability, timeliness, problem solving skills, communication skills, and professionalism needed, while another 15 percent agreed; the results for FY 2022 were 94 percent and 6 percent, respectively	The FY 2024 survey showed an improvement over FY 2023 results. With a 26% response rate, 88% of respondents strongly agreed that the procurement staff has the knowledge, professionalism, communication and problem-solving skills required. Overall, the FY 2024 satisfaction survey returned positive results.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: Survey results.

The Fiscal Year 2024 goal to improve procurement satisfaction was successfully met, as demonstrated by the results of the annual procurement satisfaction survey. The survey showed notable improvement over FY 2023, with 88% of respondents strongly agreeing

<sup>10</sup> Prior to FY 2024, PG 3.22(b) was “Gauge satisfaction with procurement process, including efforts to incorporate suggestions/feedback into process, via internal surveys.”

that procurement staff possessed the necessary skills required for their roles, up from 80 percent the previous year. Additionally, all general comments provided in the survey were positive, highlighting the continued effectiveness and professionalism of the procurement team.

As part of the OCFO's commitment to aligning goals with meaningful and impactful measures, this goal will be retired and replaced by a new performance goal focused on achieving a 95 percent accuracy rate in DATA Act reporting. The reliability of DATA Act reporting is considered a more significant indicator of the OCFO's effectiveness in financial and procurement management. This shift emphasizes the importance of providing accurate, complete, and timely data to the public, reflecting the OCFO's dedication to transparency and accountability in its operations.



### Performance goal 3.22(c):

Ensure that all agency Contracting Officer Representatives (CORs) have been properly trained and are maintaining proper COR files

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	At least 85% of sampled COR files are maintained properly, and COR training is offered as needed	At least 90% of sampled COR files are maintained properly, and COR training is offered as needed	At least 90% of sampled COR files are maintained properly, and COR training is offered as needed	At least 90% of sampled COR files are maintained properly, and COR training is offered as needed	At least 90% of sampled COR files are maintained properly, and COR training is offered as needed
Results	A well-attended on-site COR training class was offered; the Office of Procurement sampled COR files every quarter and found them to be complete and accurate; and, for the 1st time, the Office of Procurement provided each COR supervisor input during the annual appraisal process on how the CORs performed their duties during the year.	A well-attended and well-received on-site COR training class was offered; the Office of Procurement sampled COR files and found them to be complete and accurate; and the Office of Procurement again provided each COR supervisor input during the annual appraisal process on how the CORs performed their duties during the year.	CORs were again provided with training, and the Office of Procurement again sampled COR files, which were found to be in good order with no serious deficiencies.	All of the Commission's CORs are current in their certifications, 2 one-day training courses were offered, and the files of three CORs were reviewed and all were compliant	The Commission's CORs are appointed only after confirmation of having current FAC-COR certification. One all-day training was brought onsite (presented virtually), which was well-attended by agency CORs. Quarterly reviews of COR files were found to be in good order and meetings with CORs provided assurance CORs are performing the role of COR well.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Random Sampling of Contract Files for Q2/Q3.

During FY 2024, the Office of Procurement successfully ensured that all of the Commission's Contracting Officer Representatives (CORs) were properly trained and maintaining their files in accordance with required standards. All CORs were confirmed to have current Federal Acquisition Certification for Contracting Officer Representatives (FAC-COR) credentials prior to their appointments, reflecting compliance with agency and federal requirements.

A comprehensive, all-day training session was provided onsite (delivered virtually), which was well-attended by the agency’s CORs. This training reinforced their roles and responsibilities, enhancing their ability to manage contracts effectively. Quarterly reviews of COR files demonstrated that at least 90 percent of sampled files were properly maintained, meeting the established target for the fiscal year. Additionally, regular meetings with CORs provided ongoing support and assurance that they are performing their roles effectively.

The target for FY 2024 was met, showcasing the Office of Procurement’s commitment to supporting the Commission’s acquisition activities through robust training and oversight of COR responsibilities. These efforts ensure that contracts are managed efficiently and in compliance with applicable regulations, contributing to the agency’s overall operational success.

### Performance goal 3.23:

Maintain a robust system of financial management and internal controls to achieve an annual unmodified audit opinion on the agency’s financial statements, with no material weaknesses

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Unmodified audit opinion	Unmodified audit opinion with no more than one material weakness	Unmodified audit opinion, no material weaknesses	Unmodified audit opinion, no material weaknesses	Unmodified audit opinion, no material weaknesses
Results	Unmodified audit opinion with no material weaknesses	Unmodified audit opinion with no material weaknesses	Unmodified audit opinion with no material weaknesses	Unmodified audit opinion with no material weaknesses	Unmodified audit opinion with no material weaknesses
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: Audit opinion on the agency financial statements.

Note: Beginning in FY 2020, the Commission strengthened the target by striving to limit or eliminate material weaknesses.

The goal of maintaining a robust system of financial management and internal controls to achieve an annual unmodified audit opinion was successfully met in FY 2024. This marks the Commission’s 14th consecutive year of receiving an unmodified opinion on its financial statements. Additionally, the auditors identified no material weaknesses or significant deficiencies in the design or operation of internal controls over financial reporting.

This achievement reflects the Commission’s commitment to excellence in financial management. Continuous review, documentation, and testing of financial systems and processes throughout the year ensured that internal controls remained effective and aligned with best practices. The result underscores the strength of the Commission’s internal controls and its dedication to maintaining the highest standards of financial integrity and accountability.

## Performance goal 3.24:

Maintain a budget process that broadly increases Commission participation and responsibility at all levels, and that clearly links budget formulation with performance planning

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Managers at all levels project workloads; estimate and justify the personnel and other resources needed; and clearly link budget formulation to performance planning to provide justification for requests. Also ensure that any requests by Commissioners to amend/improve the process are addressed.	Managers at all levels project workloads; estimate and justify the personnel and other resources needed; and clearly link budget formulation to performance planning to provide justification for requests. Also ensure that any requests by Commissioners to amend/improve the process are addressed.	Managers at all levels project workloads; estimate and justify the personnel and other resources needed; and clearly link budget formulation to performance planning to provide justification for requests. Also ensure that any requests by Commissioners to amend/improve the process are addressed.	Managers at all levels project workloads; estimate and justify the personnel and other resources needed; and clearly link budget formulation to performance planning to provide justification for requests. Also ensure that any requests by Commissioners to amend/ improve the process are addressed.	Managers at all levels project workloads; estimate and justify the personnel and other resources needed; and clearly link budget formulation to performance planning to provide justification for requests. Also ensure that any requests by Commissioners to amend/ improve the process are addressed.
Results	Managers again estimated and justified the personnel and non-personnel resources they needed based upon projected workloads; budget formulation was linked to performance planning in the justification process; and the process was modified this year to streamline it and make it even more transparent and inclusive. We received only positive comments on the Budget Review Board process from the Commissioners and their staff, and the Commissioners were able to unanimously approve the FY 2021 Expenditure Plan and FY 2022 Budget Request in a timely manner.	Needed personnel and non-personnel resources were again estimated and justified by managers based upon projected workloads, and budget formulation was linked to performance planning in the justification process. We received only positive comments on the Budget Review Board process from the Commissioners and their staff, and the Commissioners were able to unanimously approve the FY 2022 Expenditure Plan and FY 2023 Budget Request in a timely manner.	As in prior years managers again presented and justified personnel and non-personnel resources needed based upon projected workloads. While we generally received positive feedback from the Commissioners, they did have questions about the presentation of the personnel data, including the costs. Nonetheless, the Commissioners were able to unanimously approve the FY 2023 Expenditure Plan and the FY 2024 Budget request in a timely manner.	The Budget and Finance Committee, working with the other management committees, prepared an FY 2024 Expenditure Plan and FY 2025 Budget Request and a proposed staffing plan, along with necessary supporting documentation, for Commission review during the BRB. The Commission was able to review and discuss the issues and supporting data and make timely decisions about the FY 2024 Expenditure Plan and the FY 2025 Budget request	The Budget and Finance Committee, working with the other management committees, prepared an FY 2025 Expenditure Plan and FY 2026 Budget Request, along with necessary supporting documentation, for Commission review during the BRB. Commission review and approval of the FY 2025 hiring plan prior to the BRB facilitated more strategic conversations and decision making during the BRB and presented a clearer link between budget formulation and performance planning.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: Increased participation by managers in budget process; documentation to support resource requests.

The goal was met as individual managers and the management committees continued to broaden their participation in the process. Managers again estimated and justified the non-personnel resources needed based upon projected workloads for the FY 2024 Budget Review Board (BRB). New to the process this year was development of the FY 2025 hiring plan for Commission review and approval prior to the BRB. This enabled more strategic conversations and decision making during the BRB, focusing on resource requests and associated risks. Also new to the process was that management committees (not office directors or program managers) presented to the BRB their respective components of the expenditure plan, budget request, and associated risks – personnel, non-personnel, and information technology. The Commissioners unanimously approved the FY 2025 Expenditure Plan and FY 2026 Budget Request in a timely manner.

## **Strategic Objective 3.3**

### **Technology: Implement reliable and secure systems that promote resilience, innovation, and efficiency<sup>11</sup>**

The USITC is committed to providing reliable and secure systems to its entire user community. These systems must not only promote resilience, thus ensuring availability and accessibility, but must also provide for innovation and efficiency. These systems must be comprised of current technologies and promote business process improvements and improved usability. These solutions must also comply with federal mandates. To support this objective, the Commission continues to provide technology, security, infrastructure, planning, consulting, acquisition, implementation, testing, and ongoing technical support for all its IT services.

The Commission continues to modernize its infrastructure, improve systems availability and accessibility, advance the agency's cybersecurity posture, and improve its operating efficiency. The Commission accomplishes this by implementing cloud solutions, supporting mobile technology initiatives, utilizing commercially available solutions, and taking advantage of shared services, where applicable, while strictly adhering to a secure configuration throughout its architecture. The USITC recognizes the importance of effective information resources

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<sup>11</sup> The leader for this strategic objective is the Chief Information Officer (CIO)

management and focuses significant effort and resources on addressing its needs in this area, including priorities contained in various federal initiatives.

Through its judicious management of IT resources and the implementation of new technologies, the Commission remains committed to implementing reliable and secure systems that promote resilience, innovation, and efficiency. Additionally, it will continue to meet all mandates, improve its security posture, and increase the availability of its systems.

Strategic Objective 3.3 is intended to ensure that IT resources support the USITC with performance goals for FY 2025 and 2026 that quantify how the Office of the Chief Information Officer (OCIO) intends to support this objective.

The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

### **Performance goal 3.31:**

Implement reliable IT solutions that promote resilience, innovation, and efficiency to better support the Commission’s user community

<b>FY 2024</b>	
Target	Continuation of program
Results	See 3.31 (a-b)
Status	Target met

Performance indicators: Continued refinement of program for tracking percentage availability to users of IT systems that are important to internal and external customers.

## Performance goal 3.31(a):

### Maintain availability of core IT systems

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Maintain system uptime of at least an average of 99.0% availability or meeting SLA for cloud-based services for all measured systems excluding scheduled maintenance.	Maintain system uptime of at least an average of 99.0% availability or meeting SLA for cloud-based services for all measured systems excluding scheduled maintenance.	Maintain system uptime of at least an average of 99.0% availability or meeting SLA for cloud-based services for all measured systems excluding scheduled maintenance.	Maintain core IT system uptime of at least an average of 99.0% availability or meeting SLA for cloud-based services for all measured systems excluding scheduled maintenance.	Maintain core IT system uptime of at least an average of 99.0% availability or meeting SLA for cloud-based services for all measured systems excluding scheduled maintenance.
Results	All measured systems exceeded the established baseline of 99.0% availability.	All measured systems exceeded the established baseline of 99.0% availability.	All measured systems exceeded the established baseline of 99.0% availability.	All measured systems exceeded the established baseline of 99.0% availability.	All measured systems exceeded the established baseline of 99.0% availability.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: Percentage of availability to users of the following systems: Local Area Network (LAN), Remote Access, IS, HTS, and DataWeb. Meeting SLA for Cloud Email service.

Note: When e-mail services moved to the cloud this uptime performance indicator was modified to reflect the contractual SLA. Beginning in FY 2021, the HTS system replaced SharePoint which was moved to the cloud-based SharePoint Online service covered under the same contractual SLA as Cloud Email service. For FY 24 and beyond, EDIS is replaced by IS which includes both EDIS and IDS.

In FY 2024, the Commission remained committed to maintaining the accessibility and availability of its IT systems. Through judicious management of its IT resources and the implementation of enhanced monitoring, it was able to meet all mandates, improve its security posture, and maintain the availability of its systems.

### Performance goal 3.31(b):

Verification and validation of backups. Backups are validated and verified twice a year, no less than three months apart

	FY 2023	FY 2024
Target	100% compliance with performance indicators	100% compliance with performance indicators
Results	Backups of core business applications and functions validated and verified	Backups of core business applications and functions validated and verified
Status	Target met	Target met

Performance indicators: Confirmation of validation and verification of backups for core business applications and functions: file shares, IS, HTS, DataWeb, and MS 365.

In FY 2023 and FY 2024, the Commission executed both planned and ad hoc restoration activities of data and system backups to validate the ability to restore those data and systems and ensure their integrity through judicious verification. Through these quarterly recovery and restoration efforts of agency records, production applications and databases, the Commission followed through on its commitment to ensuring its information resources are resilient and available to meet its mission and to provide high quality services to the public, even in the face of disaster or emergency.

### Performance goal 3.32:

Implement secure IT solutions that promote resilience, innovation, and efficiency to better support the Commission’s user community

	FY 2024
Target	Continuation of program
Results	See 3.32 (a-d)
Status	Target met

Performance indicators: Development of capabilities consistent with government-wide priorities.

### Performance goal 3.32(a):

Ensure all Known Exploited Vulnerabilities (KEV) are remediated within 30 days of the timelines set forth in the Department of Homeland Security Cybersecurity and Infrastructure Security Agency (DHS –CISA) KEV Catalog

	FY 2023	FY 2024
Target	100%	100%
Results	Most KEVs remediated before DHS CISA due date	All KEVs remediated within target timeline
Status	Target partially met	Target met

Performance indicator: Number of remediated KEVs found on ITCNET divided by the total number of applicable KEVs in the DHS CISA KEV Catalog, grouped by due date.

Building on procedures established in FY 2023, in FY 2024 the Commission matured its mitigation procedures for known exploitable vulnerabilities (KEVs). USITC was able to more quickly remediate these vulnerabilities within the defined timelines to ensure its

overall security posture as well as to be in compliance with Binding Operational Directive (BOD) 22-01. The Commission fine-tuned its monitoring and reporting procedures to more quickly ascertain the actions needed to remediate identified KEVs within the established schedule, leading to improvement in meeting the target for this goal.

**Performance goal 3.32(b):**

Ensure Commission information systems and FEDRAMP certified web-based applications have an Ongoing Authorization to Operate (ATO) in place prior to entering operation or upon expiration of the previous ATO

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	100%	100%	100%	100%	100%
Results	All defined Commission systems have a valid ATO. EDIS ATO re-issued in FY 2020.	All defined Commission systems have a valid ATO.	All defined Commission systems have a valid ATO.	All defined Commission systems and certified cloud services have a valid ATO. IS ATO re-issued in FY2023.	All defined Commission systems and certified cloud services have a valid ATO. HTS ATO re-issued in FY2024
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Number of Commission information systems with an ATO divided by the total number of Commission information systems.

The Commission continued to ensure that all systems maintained current ATOs throughout FY 2024 by utilizing a continuous monitoring program, ensuring ATOs remain valid so long as ongoing security requirements are met. In FY 2024, this included ensuring all cloud services in use had the required FedRAMP certification and were issued a valid ATO.



## Performance goal 3.32(c):

Maintain and verify secure configuration baselines on all baselined workstations and servers for 99% of baseline settings

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Monitoring of metric has provided an opportunity for improvement which requires a significant level of effort to implement. Improvements to be in place by end of FY 2020. Metric reporting to resume in FY 2021.	Secure configurations maintained on baselined servers and workstations. Approved deviations documented and validated. 100% compliance.	Secure configurations maintained on baselined servers and workstations. Approved deviations documented and validated. Compliance rate equal to or higher than previous reporting period.	Secure configurations maintained on baselined servers and workstations. Approved deviations documented and validated. Compliance rate equal to or higher than previous reporting period.	Secure configurations maintained on baselined servers and workstations. Approved deviations documented and validated. Compliance rate equal to or higher than previous reporting period.
Results	New security configuration monitoring plan in place. Enterprise compliance score calculated at end of Q4 to establish baseline metric.	Increased number of secure configurations maintained on baselined servers and workstations. Approved deviations documented and validated.	The number of secure configurations maintained on baselined workstations and servers decreased from 98.67% in FY 2021 to 89.15% in FY 2022.	The number of secure configurations maintained on baselined workstations and servers increased from 89.15% in FY 2022 to 89.40% in FY 2023.	The number of secure configurations maintained on baselined workstations and servers increased from 89.40% in FY 2023 to 94.68% in FY 2024.
Status	Target met	Target met	Target not met	Target met	Target met

Performance indicators: Scans of production devices baselined upon issuance. Reported as a percent of compliant settings on servers and workstations, reported separately based on operating system. The FY 2020 performance indicator is to establish a new security configuration monitoring plan and the baseline metric for an enterprise compliance score based on scans of all devices. The FY 2021 – FY 2024 indicator is improvement over the previous year's score.

The Commission's goal for maintaining secure configurations on all of its workstations and servers is to meet a high level of compliance with all established baselines and/or documented approved deviations. As measured by computing an enterprise compliance score defined in its Security Configuration Baseline Monitoring Plan, the target is to exceed the score of the previous year, with an ultimate stretch goal of annually exceeding 99 percent compliance. During the FY 2024 reporting period, the goal was met as the annual enterprise compliance score increased by 5.28 percentage points from 89.40 percent in FY 2023 to 94.68 percent in FY 2024. The compliance score for Windows workstations stayed steady in FY 2024 with only a slight decrease of 0.01

percentage points and the score for Windows servers increased from the previous year’s score by 0.32 percentage points. The score for Linux servers increased substantially from FY 2023 to FY 2024 by 15.53 percentage points due to the retirement of legacy servers running an older version of the operating system.

**Performance goal 3.32(d):**

Ensure the Commission maintains an accurate, near real-time empirical inventory of authorized assets against which all aspects of continuous monitoring (to include but not limited to vulnerability scanning, patching, performance related, etc.) can be performed

	FY 2023	FY 2024
Target	75% accuracy of near real-time inventory	95% accuracy of near real-time inventory
Results	Initial short-term IT asset management solution implemented and long-term IT asset management solution acquired and under implementation	Initial IT asset management inventory solution in place with a 95% accuracy rate. Long term solution re-awarded and under implementation
Status	Target met	Target met

Performance indicator: Number of authorized assets divided by the total number of assets identified via scanning of all nets and subnets.

In FY 2024, the Commission took steps to ensure an accurate and up-to-date accounting of all IT assets in its inventory. The Commission continued to utilize a manual process for managing IT assets while procuring an electronic software package. This procurement was finalized and the software implementation commenced in the fourth quarter of the fiscal year. This new approach to IT asset management will not only lead to improvements in fiscal accountability of assets but also support more comprehensive monitoring of all assets for security purposes.

## Strategic Objective 3.4

### Data: Manage and leverage data as an asset<sup>12</sup>

Managing and leveraging data as an asset is critical to accomplishing the agency’s mission. To support Commission and government-wide goals and objectives, the Commission will continue to enhance its data governance policies and practices. Data is essential to all of the Commission’s work. These goals ensure a fully cohesive data-centered approach to supporting the agency’s mission.

We recognize the importance of leveraging data as an asset and are focusing significant effort and resources on addressing our needs in this area, including priorities contained in various federal initiatives. The Commission’s strategic objective 3.4 is intended to ensure that data support our mission. We will use several strategies to meet this strategic objective and our performance goals quantify how the Commission intends to support this objective.

The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

#### Performance goal 3.41:

Data governance guidance is issued that strengthens enterprise-wide data management

	FY 2022	FY 2023	FY 2024
Target	Priorities established annually	Priorities established annually	Priorities established annually
Results	Data governance guidance updated to strengthen enterprise-wide data management but not issued during FY 2022.	Data governance updated and issued in FY 2023.	Data governance handbook updated and submitted for review and issuance.
Status	Target not met	Target met	Target met

Performance indicators: Additions to the Data Governance Manual by the Data Governance Board; documentation of prioritization.

The Data Governance Handbook was updated and submitted for review and issuance in FY 2024. It included policies on data quality, data-use standards, and data system documentation requirements.

<sup>12</sup> The leader for this strategic objective is the Chief Data Officer (CDO).

## Performance goal 3.42:

To advance the agency’s mission, identify, maintain, and make accessible accurate, timely, and complete information necessary to answer priority questions

	FY 2022	FY 2023	FY 2024
Target	Priorities established annually	Priorities established annually	Priorities established annually
Results	Analytic tools used for legacy administrative data systems replaced with updated business intelligence tools.	Analytic tools were developed and deployed in FY 2023 answering priority questions related to investigative activities.	Analytic tools were developed and deployed in FY 2024 answering priority questions related to human resource data.
Status	Target met	Target met	Target met

Performance indicators: Documentation of prioritization of key management questions, data systems documentation, and reports deployed.

During FY 2024, human resource data assets were prioritized for making accessible, accurate, timely, and pertinent information necessary to answer priority questions. As part of this initiative, the human resources’ Recruitment Tracking Application was launched to provide stakeholders with a live-time view of all approved recruitments and their progression through phases during their ‘lifecycle.’ The application provides an enhanced reporting on a myriad of recruitment metrics for the Chief Human Capital Officer, Human Capital Committee, and the Chair’s Office. Additionally, the Personnel Cost Center Model was developed to provide dynamic reporting using personnel data. This allows the agency to easily analyze likely personnel cost center expenditures and to maintain critical data for doing so.

## Performance goal 3.43:

Core agency applications and administrative data systems are documented by FY 2026

	FY 2022	FY 2023	FY 2024
Target	20 percent of the identified data systems are documented	20 percent of the identified data systems are documented	20 percent of the identified data systems are documented
Results	13 percent of the identified data systems documented.	17 percent of the identified data systems documented.	14 percent of the identified data systems documented.
Status	Target partially met	Target partially met	Target partially met

Performance indicators: Meta data, inclusion in the managing data inventory, data quality plans, data glossaries, SOPs, data quality review practices.

As of September 30, 2024, there were 54 identified core data assets. Of those, data owners reported that 18 had data glossaries, 13 had data management plans, and 17 had standard operating procedures (SOPs). To have met the goal for FY 2024, 11 data assets must have been fully documented by the end of the fiscal year. To be fully documented a data system must have enough documentation to identify the data contained in the system (e.g., data dictionary), a description of how the data may be used and any caveats in using the data, and a description of how (and if) the data are maintained (e.g., data management plan and SOPs if appropriate). Data owners may document these elements separately or combine them into one document. By the end of FY 2024, of the 54 inventoried core data assets, 17 were fully documented.

## Performance goal 3.44:

Ensure application database systems are continuously maintained and periodically upgraded

FY 2024	
Target	Develop and implement strengthened functionality, capacity, and security across core Commission database systems by FY 2026.
Results	Three of five sub targets met
Status	Target partially met

Performance indicators: Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.

### Performance goal 3.44(a):

Continuously improve core Commission database systems

#### HTS DMS/HTS Search:

	FY 2022	FY 2023	FY 2024
Target	Develop and implement improvements to the HTS DMS and HTS Search	Develop and implement improvements to the HTS DMS.	Evaluate the effectiveness of the implemented solution and document deficiencies.
Results	The business requirements for improving the HTS DMS and Search system were finalized. The OCIO development team began implementing technology updates to comply with Executive Order 14028 to improve system stability and security. Development efforts will continue in FY 2023 to implement required functional improvements to the HTS DMS.	The final deployment of improvements to the external HTS application was executed on July 19, 2023. Final deployment of improvements to the HTS DMS application was executed on August 2, 2023.	Evaluation of the deployed HTS data system completed in FY 2024 resulting in the kickoff of the development of requirements for the next iteration of the HTS DMS.
Status	Target partially met	Target met	Target met

Performance indicators: Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.

During FY 2024, the Commission completed its evaluation of the deployed solution, relying heavily on staff experience, public survey responses, and HTS help emails. Driven in part by this evaluation, the HTS application will be undergoing a large-scale re-engineering in its next development cycle.

**DataWeb:**

	<b>FY 2023</b>	<b>FY 2024</b>
Target	Review stakeholder feedback and update requirements improving the deployed solution.	Develop and implement improvements to DataWeb
Results	Have collected and reviewed stakeholder feedback, updated the requirements for improving the system and submitted them to OCIO on September 26, 2023, for development and deployment in FY2024.	DataWeb underwent development during 2024 and is scheduled for deployment in quarter two of FY 2025.
Status	Target met	Target partially met

Performance indicators: Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.

In FY 2024, the Commission worked to develop version 5 of the DataWeb database system. Deployment of the updated version is scheduled for quarter two of FY 2025.

**EDIS:**

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Advance efforts to serve public documents and begin to develop electronic service of Commission confidential documents subject to Administrative Protective Order on the parties via electronic means	Continue developing ability to serve Commission confidential documents subject to Administrative Protective Order on the parties via electronic means	Serve Commission confidential documents subject to Administrative Protective Order on the parties via electronic means	Serve Commission confidential documents subject to Administrative Protective Order on the parties via EDIS	Serve Commission confidential documents subject to Administrative Protective Order on the parties via EDIS
Results	Development for electronic service of public documents via EDIS has made substantial progress, including capabilities to capture participant and representative information, manage service lists, and prepare certificates of service, as well as implanting most integration points with IDS. Additional functionality remains to be implemented, including the actual service of documents	Development of the capability to electronically serve public documents in 337 investigations was completed and deployed as EDIS 3.11. All primary required features were implemented including: 1) capture of participants and representatives when filing Complaints and Notices of Appearance, 2) electronic management of service lists, 3) selection and generation of a Certificate of Service for a document to be served, and 4) accessibility of served documents in the Service Inbox of the selected service recipients.	Development on electronic service of confidential documents was minimal due to prioritized focus on EO 14028 compliance and addressing critical security vulnerabilities, including implementation of multi-factor authentication and necessary technology upgrades. Development on confidential e-service is expected to resume and be completed in FY 2023.	Development on Confidential E-Service was delayed to continue addressing other priorities including security vulnerabilities and associated technology upgrades, integration of Login.gov and OS migration. Staff resources are being adjusted to ensure progress and completion of project in FY 2024. Progress was made in integration of Login.gov and associated capabilities to support multi-factor authentication.	Development focused on implementing new features to support service of confidential documents including the delegates feature for filing and accessing documents and integration of Login.gov for multi-factor authentication. Other improvements included adding a new bulk filing capability, infrastructure and OS upgrades, and security measures to increase vulnerability detection.
Status	Target partially met	Target met	Target not met	Target not met	Target partially met

Performance indicators: Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.

During FY 2021, the Commission made significant progress implementing many primary features including: 1) capture of participants and representatives, 2) electronic management of service lists, 3) selection and generation of a Certificate of Service for a

document to be served, and 4) accessibility of served documents. All features to electronically serve public documents in 337 investigations were completed, enabled, and deployed as EDIS 3.11. In FY 2022, development on e-service of confidential documents slowed due to re-prioritization of efforts to implement security features required by EO 14028 and to make technology upgrades needed to address critical security vulnerabilities. This work continued in FY 2023 with a focus on implementing functional enhancements for multi-factor authentication and upgrading application technologies to address security vulnerabilities. In FY 2024, a major security upgrade was completed with the implementation of multi-factor authentication using GSA’s Login.gov service. This upgrade included adding the new delegation feature to support the business processes of external users when filing and accessing electronically served documents. Several other new functional enhancements were added to improve the user experience and productivity of USITC staff including the ability to concurrently file multiple documents. Measures were also taken to expand detection of security vulnerabilities in EDIS through participation in a DHS program which recruits external security researchers to analyze EDIS and report potential vulnerabilities.

**IDS:**

	<b>FY 2022</b>	<b>FY 2023</b>	<b>FY 2024</b>
Target	Evaluate the effectiveness of the implemented solution and document deficiencies.	Complete the development of advanced search functionality and release IDS to the public.	Evaluate the effectiveness of the implemented advanced search and update the requirements for improving the deployed solution addressing deficiencies.
Results	Deployed solution evaluated and additional requirements documented for the next development cycle.	Advanced search deployed and IDS released to the public.	Requirements for IDS version 2 submitted with planned development in FY 2025
Status	Target met	Target met	Target met

Performance indicators: Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.

During FY 2024, the Commission developed version 2 requirements to enhance the search and accessibility of investigative data. In FY 2024 Commission staff continued to advance data cleaning efforts to ensure accurate, complete, and timely data are released to the public.



## Performance goal 3.44(b):

All new major systems deployed to production are Open Data compliant

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Public data behind all new major systems deployed to production in FY 2020 will be available in machine-readable format and accessible on the USITC Open Data webpage	Public data behind all new major systems deployed to production in FY 2021 will be available in machine-readable format and accessible on the USITC Open Data webpage	Public data behind all new major systems deployed to production in FY 2022 will be available in machine-readable format and accessible on the USITC Open Data webpage	Public data behind all new major systems deployed to production in FY 2023 will be available in machine-readable format and accessible on the USITC Open Data webpage.	Public data behind all new major systems deployed to production in FY 2024 will be available in machine-readable format and accessible on the USITC Open Data webpage.
Results	No new major systems were deployed in FY 2020. All eligible data sets identified by the Chief Data Officer are available and up to date on the Open Data website.	No new major systems were deployed in FY 2021. All eligible data sets identified by the Chief Data Officer are available and up to date on the Open Data website.	No new major systems were deployed in FY 2022. All eligible data sets identified by the Chief Data Officer are available and up to date on the Open Data website.	IDS released to the public as Open Data Compliant. All eligible data sets identified by the Chief Data Officer are available and up to date on the Open Data website.	No new major systems were deployed in FY 2024. All eligible data sets identified by the Chief Data Officer are available and up to date on the Open Data website.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicator: Availability of information systems providing Open Data.

In FY 2024, the Commission remained committed to improving the transparency, accessibility, and availability of its data systems. Through judicious management of its IT resources and the implementation of new technologies, it was able to meet all mandates, increase the availability of its systems, and increase the amount of information it makes available to the public.

## Strategic Objective 3.5

### Ongoing Operational Improvements: Evaluate and improve processes and communications<sup>13</sup>

Operational effectiveness is about continually improving functional performance. To accomplish this, managers lead and control the functional activities within the agency, and continually measure and improve the processes for which they are responsible.

Strategies we will continue to use to meet this strategic objective include:

- Using ERM to identify risks and establish priorities to inform agency decision makers
- Refocusing available resources to support agency-wide policy development
- Investing and modernizing our IT infrastructure and management systems

The Commission recognizes that staffing constraints, unexpected external requirements, and other priorities may slow efforts to fully accomplish all its planned initiatives in the near future. However, we believe that recent developments—in particular, expanded IT capabilities both within and outside of the OCIO and increased managerial focus on this and related issues—may mitigate these constraints.

In addition, the Commission is committed to maintaining a safe and secure operating environment for all its employees. We will continue to cultivate a culture of awareness of physical and personnel safety and security concerns. Strategies to promote physical and personnel safety and security include:

- Communicating important security information to promote employee confidence with the Commission's security posture
- Providing appropriate information regarding employee health and safety to address employee concerns about the Commission's working environment
- Providing agency-wide training for employees on security threats

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<sup>13</sup> The leader for this strategic objective is the Director of Operations and appendix B provides information on the lead offices responsible for each of the performance goals supporting this strategic objective.

The performance results for the performance goals for this strategic objective are set forth in tabular form and then described below.

### Performance goal 3.51:

Improve the efficiency and timely delivery of Commission products by evaluating and implementing improved processes of the agency

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Use internal and external performance audits, as well as performance management, ERM, budget and expenditure plan data, and annual Statement of Assurance reporting activities to identify agency processes most in need of improvement; evaluate and implement new processes or process improvements, where identified; evaluate effectiveness of new or amended processes	Use internal and external performance audits, as well as performance management, ERM, budget and expenditure plan data, and annual Statement of Assurance reporting activities to identify agency processes most in need of improvement; evaluate and implement new processes or process improvements, where identified; evaluate effectiveness of new or amended processes	Use internal and external performance audits, as well as performance management, ERM, budget and expenditure plan data, and annual Statement of Assurance reporting activities to identify agency processes most in need of improvement; evaluate and implement new processes or process improvements, where identified; evaluate effectiveness of new or amended processes	Use internal and external performance audits, as well as performance management, ERM, budget and expenditure plan data, and annual Statement of Assurance reporting activities to identify agency processes most in need of improvement; prioritize and implement new processes or process improvements, where identified; evaluate effectiveness of new or amended processes	Use internal and external performance audits, as well as performance management, ERM, budget and expenditure plan data, and annual Statement of Assurance reporting activities to identify agency processes most in need of improvement; prioritize and implement new processes or process improvements, where identified; evaluate effectiveness of new or amended processes
Results	Continued refinement of various agency processes such as those pertaining to factfinding investigations, records retention, budget formulation, and expenditure plan execution.	Continued refinement of various agency processes such as those pertaining to factfinding investigations, records retention, budget formulation, and expenditure plan execution.	Continued refinement of various agency processes such as those pertaining to factfinding investigations, records retention, budget formulation, and expenditure plan execution.	Continued improvement of agency processes such as those pertaining to factfinding investigations, data management, internal rule development, budget formulation, and expenditure plan development	Continued improvement of agency processes such as those pertaining to factfinding investigations, import injury investigations, recruitment, data management, internal rule development, budget formulation, and expenditure plan development
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: Number of major processes identified; process improvements identified, implemented, and evaluated.

During FY 2024, agency staff made progress on improving a number of important Commission processes, including import injury information collection and provision, financial management operations, recruitment tracking, the budget process, data management, internal rule

development, and internal factfinding review processes. One of the major accomplishments during FY 2024 was the completion of a comprehensive evaluation and selection of a new Shared Service Provider (SSP). The transition to a new SSP will enhance the efficiency and effectiveness of operations by streamlining processes and placing the agency in a position to achieve greater financial transparency, improved data accuracy, accountability, and timeliness of financial information.

The Commission continued to make strides in improving its data governance activities, by updating and expanding the agency guidance on data governance and leveraging technology to make information available to decision makers in the form they need. The Commission made several major technology and cybersecurity updates to its Electronic Document Information System (EDIS) including integrating multifactor authentication for external users. The Commission also continued to develop and deploy cutting edge controls to ensure data are protected from creation through destruction.

Additionally, the Commission developed a recruitment tracking app to aid in increasing transparency and efficiency in its recruitment process. The Commission also conducted strategic reviews of its performance management system, labor cost program, and travel program. These strategic reviews evaluated the efficiency and effectiveness of these programs and made recommendations for program improvements.

FY 2024 process improvements addressed ERM identified risks such as human capital challenges (recruitment), budget, system of internal rules throughput, data management concerns, and IT security.

## Performance goal 3.52:

### Maintain an agency portfolio of enterprise risks

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	PMSPC reviews 100% of identified risks at least on a quarterly basis	PMSPC reviews 100% of identified risks at least on a quarterly basis	PMSPC reviews 100% of identified risks at least on a quarterly basis	PMSPC reviews 100% of identified risks at least on a quarterly basis	PMSPC reviews 100% of identified risks at least on a quarterly basis
Results	The PMSPC used the risk profile developed from the ERM database to rank risks from an agency-wide perspective. Risks were discussed, reviewed, and prioritized to provide the Chairman and other Commissioners an assessment of the risks the agency faces arising from its operations and mission-support activities.	The PMSPC used the risk profile developed from the ERM database to rank risks from an agency-wide perspective. Risks were discussed, reviewed, and prioritized to provide the Chairman and other Commissioners an assessment of the risks the agency faces arising from its operations and mission-support activities. PMSPC met monthly and more frequently as needed.	The PMSPC used the risk profile developed from the ERM database to rank risks from an agency-wide perspective. Risks were discussed, reviewed, and prioritized to provide the Chairman and other Commissioners an assessment of the risks the agency faces arising from its operations and mission-support activities. PMSPC met monthly and more frequently as needed.	The PMSPC used the risk profile developed from the ERM database to rank risks from an agency-wide perspective. Risks were discussed, reviewed, and prioritized to provide the Chairman and other Commissioners an assessment of the risks the agency faces arising from its operations and mission-support activities. PMSPC met monthly and more frequently as needed.	The PMSPC used the risk profile developed from the ERM database to rank risks from an agency-wide perspective. Risks were discussed, reviewed, and prioritized to provide the Chairman and other Commissioners an assessment of the risks the agency faces arising from its operations and mission-support activities. PMSPC met monthly and more frequently as needed. Staffing Risk Profiles were utilized for Human Capital Planning.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: PMSPC-generated quarterly top agency risk summary for Chair's review.

The Commission uses an Enterprise Risk Management (ERM) framework to manage risks and consider opportunities related to achievement of objectives. This framework allows the Commission to monitor risks in all areas of the agency and better ensure organizational efficiency and effectiveness. During FY 2024, senior executives and managers regularly assessed agency risks and used that information to inform planning and budget formulation decisions. The Commission continued its process of risk assessment by engaging Agency-wide Management Committees (e.g., Human Capital Committee, Budget Committee) to regularly discuss and evaluate risks related to the scope of the Committee's responsibilities. This process allows for more in-depth discussions at the Committee level which provided the PMSPC with better information to evaluate and rank top agency-wide risks.

## Performance goal 3.53:

Develop and update key policies and procedures for issuance in the system of internal rules and meet key development and review deadlines in a timely manner

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Identify and issue or update most critical policy Directives, identify and reissue most critical policies currently in Administrative Orders as (or consolidate into) Directives, and identify and issue most critical procedures as Handbooks.	Establish a baseline for meeting project deadlines, with an initial goal of meeting at least 80 percent.	Meet 80 percent of project deadlines	Meet 80 percent of established project deadlines for internal rule development, updating, and review.	Meet 85 percent of established project deadlines for internal rule development, updating, and review.
Results	The USITC issued 9 Directives during FY 2020 and the Internal Administrative Committee has approved an additional 5 for Chair review and issuance.	The USITC issued 7 Directives during FY 2021	The USITC issued 9 Directives and 4 handbooks during FY 2022, 85 percent of project deadlines were met	The USITC issued or updated 8 Directives during FY 2023, 73 percent of project deadlines were met.	The USITC issued or updated 3 Directives during FY 2024, 71 percent of project deadlines were met.
Status	Target partially met	Target partially met	Target met	Target not met	Target not met

Performance indicators: IAC Priority Ranking Tool and System of Internal Rules Application; New and updated most critical policy Directives; most critical procedures Handbooks; repository of record for the system of internal rules deployed to all USITC employees.

Note: In FY 2020, the goal was “Update, issue, and consolidate most critical policies and procedures.” In FY 2019, the goal was “Implement a new electronic repository of record that ensures accessibility and usability of rules and update of internal rules and update, issue, and consolidate most critical policies and procedures.” In FY 2018, the goal was “Obtain Commission approval and begin implementation of proposed system of internal rules.”

During FY 2024, the Commission issued three new or updated Directives and met 71 percent of project deadlines. The reduction in performance compared to FY 2023 is primarily attributable to an increase in other workload that directly impacts the employees most likely to work on internal rules. These factors amplify pre-existing issues with rule development and process complexity that have led to previous delays. In FY 2025, the Commission intends to implement process improvements to address identified issues and, budget permitting, increase resources to address out-of-date-rules.

## Performance goal 3.54:

Conduct annual evaluations of programs or processes identified as priorities

	FY 2022	FY 2023	FY 2024
Target	PMSPC develops priorities for evaluations	Evaluate one or more programs or processes	Conduct one or more strategic reviews of programs or processes; track accepted recommendations and actions taken as a result of the prior reviews conducted.
Results	Programs and processes identified for evaluation prioritized by the PMSPC.	Strategic reviews of prioritized areas completed.	Strategic reviews of prioritized areas completed. Tracking system for accepted recommendations was implemented.
Status	Target met	Target met	Target met

Performance indicators: Priority list developed; Evaluation conducted.

PMSPC programs and processes prioritized for review were completed in FY 2024 and FY 2025 reviews prioritized. As a result of the reviews held during FY 2024, the committee identified recommendations for improvement to the labor cost code, performance management, and travel processes.

## Performance goal 3.55:

Continuously enhance the Commission’s web presence by integrating current technologies and standards in web design that benefit the Commission’s user community and lead to improvements in user satisfaction

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Overall satisfaction with Commission’s website is consistent with the average for other executive branch agencies (not more than 3 points less than the average benchmark score for Executive Branch federal agencies); needs identified in annual assessments of technology portfolio are incorporated into planning and scoping documents	Overall satisfaction with Commission’s website is consistent with the average for other executive branch agencies (not more than 3 points less than the average benchmark score for Executive Branch federal agencies); needs identified in annual assessments of technology portfolio are incorporated into planning and scoping documents	Overall satisfaction with Commission’s website is consistent with the average for other executive branch agencies (not more than 3 points less than the average benchmark score for Executive Branch federal agencies); needs identified in annual assessments of technology portfolio are incorporated into planning and scoping documents	Evaluate new methods for collecting and analyzing user feedback on the Commission’s web presence to establish a benchmark for user satisfaction, establishing near- and long- term goals.	Measure and improve user satisfaction to achieve near-term goal established in FY 2023.
Results	USITC score of 74.2 is within +3 of benchmark score of 75.4 for executive branch federal agencies	USITC score of 70.1 is not within the +3 of benchmark score of 74.6 for executive branch federal agencies	USITC score of 69.2 is not within the +3 of benchmark score of 72.7 for executive branch federal agencies	USITC acquired a new survey service and implemented new satisfaction surveys for all web services. 7,572 survey results were received with an overall satisfaction score of 7.5 as the benchmark.	USITC’s satisfaction score for all web services was 7.9 based on 13,164 responses which exceeded the FY23 score of 7.5 by +0.4.
Status	Target met	Target not met	Target not met	Target met	Target met

Performance indicator: Survey results, assessment of use of new technologies.

In FY 2024, the Commission received 13,164 responses to the user satisfaction surveys of the USITC’s major web services, including the public website, HTS Search, EDIS, IDS, and DataWeb. On a scale of 0-10, the FY 2024 overall satisfaction score improved by 0.4 points to 7.9 from 7.5 in FY 2023, with notable improvement attributed to usability enhancements made to the HTS application which were implemented based on user feedback.



### Performance goal 3.56:

Monitor and ensure the safety and security of our workplace

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FY 2024	
Target	Improve awareness of physical and personnel safety and security policies and procedures, ensure appropriate security investigations and reinvestigations, and assess employee views on health, safety, and security at the Commission.
Results	Ongoing
Status	Ongoing

## Performance goal 3.56(a):

Improve awareness of physical and personnel safety and security policies and procedures

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	Hold at least one physical and personnel safety and security training session annually. Disseminate regular agency-wide updates on physical and personnel safety and security issues.	Hold at least one physical and personnel safety and security training session annually. Disseminate regular agency-wide updates on physical and personnel safety and security issues. Promote awareness and compliance with CDC guidelines regarding COVID-19 remedial practices for facility and personnel management	Hold at least one physical and personnel safety and security training session annually. Disseminate regular agency-wide updates on physical and personnel safety and security issues. Promote awareness and compliance with CDC guidelines regarding COVID-19 remedial practices for facility and personnel management.	Hold at least one physical and personnel safety and security training session annually. Disseminate regular agency-wide updates on physical and personnel safety and security issues.	Hold at least one physical and personnel safety and security training session annually. Disseminate regular agency-wide updates on physical and personnel safety and security issues.
Results	The USITC promoted “Cardiac Awareness Month” in Q1 and OSSS held American Red Cross CPR and First Aid certification training online during Q4.	Held online training sessions on three separate dates that covered numerous topics that included situational awareness in public areas, personal crime prevention, family-oriented operation security, and workplace violence. Continued to manage controlled facility access with adherence to CDC guidelines and observance of social distancing and masking requirements, and adjusted as necessary as new guidance became available.	OSSS provides Red Cross certification in First Aid/CPR/AED training biennially in even-numbered years. In FY 2022 training recipients received this training on 8/2, 8/9, and 8/18.	“Stop the Bleed” emergency medical training was held on three separate dates in May and June.	OSSS hosted Agency-wide Red Cross CPR/AED/First Aid Training.
Status	Target met	Target met	Target met	Target met	Target met

Performance indicators: Physical and personnel safety and security sessions and updates.

In FY 2024, OSSS hosted an agency-wide Red Cross CPR/AED/First Aid training consisting of four sessions that resulted in 40 employees earning certification.

## Performance goal 3.56(b):

Monitor employee perception of their health and safety while on the job

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	85% favorable response rate for agency FEVS question “Employees are protected from health and safety hazards on the job”	90% favorable response rate for agency FEVS question “Employees are protected from health and safety hazards on the job”	Set baseline for favorable response rate for agency FEVS “Employees are protected from health and safety hazards on the job” and other related questions.	Improvement over FY 2022 results	Improvement over FY 2023 results
Results	FY 2020 positive response rate was 90.3%	Data not available as the 2021 FEVS will be conducted during Q1 of FY 2022 (November 2021)	Baseline established: 82 Percent	88.7 percent	90.3% (+1.6pp)
Status	Target met	N/A	Target met	Target met	Target met

Performance indicator: FEVS results related to employee perception of their health and safety while on the job.

In FY 2024, the positive response rate for employee confidence that they are protected from health and safety hazards at work improved by 1.6 percentage points compared to the FY 2023 rate. This year OSSS continued performing regular safety inspections throughout the USITC’s workspace and worked with relevant offices to efficiently remedy any identified safety issues. As part of its annual FEVS action planning, OAS will work with staff and management within offices where FEVS scores lagged behind the Commission’s overall high positive response rates on this question to determine how best to identify and address issues in this area.

### Performance goal 3.56(c):

Improve employee sense and understanding of physical security

	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Target	80% favorable response rate for agency FEVS question “My organization has prepared employees for security threats”	85% favorable response rate for agency FEVS question “My organization has prepared employees for security threats”	Set baseline for favorable response rate for agency FEVS question “My organization has prepared employees for security threats”	Improvement over FY 2022 results	Improvement over FY 2023 results
Results	This question was not included on the FY 2020 FEVS	Data not available as the 2021 FEVS will be conducted during Q1 of FY 2022 (November)	Baseline established: 64.4 percent	70.6 percent	72.8%
Status	N/A	N/A	Target met	Target met	Target met

Performance indicator: FEVS results related to physical security.

In FY 2024, the positive response rate for employee confidence that they are protected from physical security threats at work improved by 2.2 percentage points compared to the FY 2023. As part of its annual FEVS action planning, OAS will continue to work with both staff and management focus groups to determine how best to continue identifying and addressing issues in this area.

### Performance goal 3.57:

In the context of the prerequisite for agencywide capital planning to support the future of work, update policies and procedures for remote work, telework, and flexible schedules

FY 2024	
Target	In consultation with the Chairman and Commissioners, and consistent with evolving executive branch policies regarding work environment plans that include telework, remote work and flexible schedules, identify the elements of agency directives and implement, as necessary, revised telework, and remote work, and flexible scheduling policies; produce appropriate directives and handbooks and move them through the internal rules process to issuance.
Results	The Commission issued updated Telework requirements for supervisory employees during both Q2 and Q4 of FY 2024. However, more guidance from the Commission is required to achieve this target.
Status	Target partially met

Performance indicators: Updated directives and handbooks, documentation of annual priorities, and actions taken to meet annual priorities.

In response to the changing requirements of the Commission's hybrid work environment, the Commission issued a series of updated policy documents requiring supervisory employees to report to the USITC building on a more regular basis to better manage the hybrid workforce. This approach has been successful in the near term and the Commission continues to consider next steps while also awaiting the issuance of updated executive branch policies from the incoming administration regarding work environment plans that include telework, remote work, and flexible schedules.

## Appendix A

# International Trade Commission Staff Offices

### Office of the Administrative Law Judges

The Commission's **administrative law judges (ALJs)** hold hearings and make initial determinations in investigations under section 337 of the Tariff Act of 1930. If, after receipt of a complaint, the Commission decides to institute an investigation, the matter is referred to this office. The Chief ALJ assigns each case on a rotational basis to one of our ALJs. After a discovery process, a formal evidentiary hearing is held in accordance with the Administrative Procedure Act (APA) (5 U.S.C. § 551 et seq.). The ALJ considers the evidentiary record and the arguments of the parties and makes an initial determination (ID), including findings of fact and conclusions of law. The ID becomes the Commission's determination unless the Commission determines to review it. Upon review, the Commission may affirm, reverse, modify, set aside, or remand the matter back to the ALJ for further proceedings. Temporary relief may be granted under the statute.

### Office of the General Counsel

The **General Counsel** serves as the Commission's chief legal advisor. The Office of the General Counsel (GC) provides legal advice and support to the commissioners and staff on investigations and research studies, represents the Commission in court and before dispute resolution panels and administrative tribunals, and provides assistance and advice on all general administrative-law matters, including personnel, ethics, and contractual issues.

### Office of Operations

The Commission's core of investigative, industry, economic, nomenclature, and technical expertise is found within the **Office of Operations (OP)**. The following seven offices are under the supervision of the Director of Operations:

The **Office of Economics (EC)** conducts investigations primarily under section 332 of the Tariff Act of 1930, section 131 of the Trade Act of 1974, and section 105 of the Bipartisan Congressional Trade Priorities and Accountability Act of 2015. EC also provides expert economic analysis for import injury investigations, as well as other industry and economic analysis products.

The **Office of Industry and Competitiveness Analysis (ICA)** conducts investigations primarily under section 332 of the Tariff Act of 1930, section 131 of the Trade Act of 1974, and section 105 of the Bipartisan Congressional Trade Priorities and Accountability Act of 2015. ICA maintains technical expertise related to the performance and global competitiveness of industries and the impact of international trade on those industries for these studies and for import injury investigations.

The **Office of Investigations (INV)** supports the Commission's mandate to conduct import injury investigations, including those specified in the Tariff Act of 1930, the Trade Act of 1974, the USMCA Implementation Act, and the Uruguay Round Agreements Act (URAA) of 1994.

The **Office of Tariff Affairs and Trade Agreements (TATA)** implements the Commission's responsibilities with respect to the Harmonized Tariff Schedule of the United States and the International Harmonized System.

The **Office of Unfair Import Investigations (OUII)** participates in adjudicatory investigations, usually involving patent and trademark infringement, conducted under section 337 of the Tariff Act of 1930, both during the pre-institution phase and as a party with no commercial interest in the outcome.

The **Office of Analysis and Research Services (OARS)** provides research and analytical support to multiple Commission mission areas by providing editorial, statistical, and research services. It comprises the Commission's libraries, as well as editorial and statistical services.

The **Trade Remedy Assistance Office (TRAO)** provides information about the benefits and remedies available under U.S. trade laws and assists small businesses seeking relief under those laws.

## **Office of External Relations**

The **Office of External Relations (ER)** develops and maintains liaison between the Commission and our external stakeholders and is our point of contact with USTR and other executive branch agencies, Congress, foreign governments, international organizations, the public, and the media.

## **Office of the Chief Information Officer**

The **Office of the Chief Information Officer (OCIO)** provides information technology leadership, a comprehensive services and applications support portfolio, and a sound technology

infrastructure to the Commission and our customers. The OCIO seeks to promote, deliver, and manage the secure and efficient application of technology to our business activities. OCIO comprises a front office and five divisions: Cybersecurity, Service Delivery, Systems Engineering, Network Support, and Data Management.

## **Office of the Chief Financial Officer**

The **Office of the Chief Financial Officer (OCFO)** compiles the Commission's annual budget, prepares the appropriation and authorization requests, and closely monitors budget execution. The OCFO also provides support for acquisitions and is responsible for financial reporting. Component offices include the Office of Budget, Office of Procurement, and the Office of Finance.

## **Office of Administrative Services**

The **Office of Administrative Services (OAS)** provides human resource services—including collective bargaining with union representatives; management of the system of internal rules; cost center management for personnel, facilities, security, support services and administrative services; information and document management; management of work-life issues; and facilities management services. In addition, it is responsible for all of our physical and personnel security matters. Component offices include Human Resources, Security and Support Services, and the Office of the Secretary.

## **Office of Internal Control and Risk Management**

The **Office of Internal Control and Risk Management (OICRM)** provides internal control and risk management oversight. The mission of OICRM is to safeguard the Commission through minimizing risks, protecting assets, promoting operational efficiency, and supporting adherence to laws, regulation, rules, and policies. The OICRM reports to the Chair.

## **Office of Inspector General**

The **Office of Inspector General (OIG)** conducts audit, evaluation, inspection, and investigative activities covering all Commission programs and strategic operations. The mission of the OIG is to promote and preserve our effectiveness, efficiency, and integrity of the USITC. The OIG independently plans and conducts activities in accordance with applicable legal regulations, receiving only broad guidance from the Chair.



## **Office of Equal Employment Opportunity**

The **Office of Equal Employment Opportunity (OEEO)** administers the Commission's equal employment opportunity (EEO) program. The Director advises the Chairman, the commissioners, and USITC managers on all EEO issues; manages and coordinates all EEO activities in accordance with relevant EEO laws and Commission regulations; evaluates the sufficiency of our EEO programs and recommends improvements or corrections, including remedial and disciplinary action; encourages and promotes diversity, equity, and inclusion outreach; and monitors recruitment activities to assure fairness in agency hiring practices.

## Appendix B

### Performance Data Sources

To assess progress toward achieving our goals, the Commission measures performance and takes steps to ensure that the performance data are accurate, reliable, and valid. We do so through quarterly performance reviews and verification. Validation and verification of performance data contribute to accuracy and reliability and help to ensure that the information is credible. Validation ensures that performance data measure what they are supposed to measure. Verification involves reviewing and substantiating the accuracy of the data.

The following tables show the indicators, target, lead office and data sources for each FY 2024 performance goal.

#### Strategic Objective 1.1

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
1.11	Deliver 100 percent of import injury investigation determinations and reports to meet the statutory deadline.	Submission of Commission determinations and reports to Commerce.	100%	INV	During FY24, transitioned from manual log to IDS report/audit log
1.12	Deliver 100 percent of statutory factfinding investigations by the deadlines set by statute or the requestor.	Submission of Commission reports to Requestor.	100%	EC	IDS
1.13	Conclude investigations into alleged section 337 violations within timeframes that are consistent with the Uruguay Round Agreements Act implementing report by FY 2026	Annual average length of investigations concluded on the merits.	15 months	OUII	IDS, EDIS
1.13(a)	Shorten average time between section 337 Final ALJ Initial Determination (ID) and the Commission's final determination	Number of months between Final ID and the issuance of the Commission's final determination.	Average length of time between Final ID and completion of the Commission's final determination is less in FY 2024 than it was in FY 2023	OUII	IDS, EDIS

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
1.13(b)	Average length of time between institution of the investigation and issuance of the final ID is consistent with the timeframe set forth in Commission's goal 1.14 and Commission Rule 210.42(a)(1)(i)	Number of months between institution of investigation and issuance of Final ID for investigations in which a final Commission determination on the merits has issued during the fiscal year	Average length of time between the institution of an investigation and the issuance of the final ID is less in FY 2024 than it was in FY 2023	OUII	IDS, EDIS
1.13(c)	Assess effectiveness of early disposition program and implement changes if appropriate	Report on assessment of effectiveness	Information assessed; improvements implemented	OUII	IDS, EDIS
1.13(d)	Assess effectiveness of severing rules and implement changes, if appropriate	Assessment; proposal.	Complete assessment and implement changes, if warranted	OUII	IDS, EDIS
1.14	Improve the timeliness of section 337 ancillary proceedings by meeting targets for or reducing the average length of ancillary proceedings	Length of ancillary proceedings concluded on the merits.	Modification—6 months Advisory—9 months Enforcement—12 months Federal Circuit remand—12 months Consolidated ancillaries—15 month	OUII	Data gathered by OGC, EDIS and IDS
1.15	Individual offices complete their portions of section 337 modifications and advisory proceedings under the pilot program within specified timeframes	Number of months to complete 337 modifications and advisory proceedings covered by the pilot program	Modification: GC—2-3 months Modification: OUII—3-6 months Modification: ALJ—6-9 months Advisory: GC—2-3 months Advisory: OUII—3-6 months Advisory: ALJ—6-9 months	OUII	Data gathered by OGC, EDIS and IDS
1.16	Post information on import injury investigations within specific time frames	Investigation-related	95% of information posted within 48 hours	INV	During FY, transitioned from manual log

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
		information posted.			to IDS report/audit log, focused on Commission-specific authoritative source documents only
1.17	Post documents to the Electronic Document Information System (EDIS) within specified timeframes	Percentage of documents posted.	Factfinding—24 hrs: Establish baseline Factfinding—48 hrs.: Establish baseline Import injury--24 hrs: 85% Import injury--48 hrs: 95% Section 337--24 hrs: 85% Section 337--48 hrs: 95%	SE	Metrics maintained and reported on by SE with assistance from CIO from data in EDIS
1.18	Post public versions of confidential section 337 final IDs and Commission opinions within specified timeframes	Number of days between issuance of confidential Commission section 337 opinions and posting of the public version.	Average length of time to post public versions of confidential section 337 Final IDs and Commission opinions is 30 days or less	OUII	EDIS
1.19	Evaluate internal factfinding processes and procedures and implement ways to make this process more efficient and effective	Factfinding process improvements identified, prioritized, and implemented. Evaluations of improvements completed	Prioritize, implement, and evaluate improvements to the factfinding processes and procedures.	EC	PAG meeting minutes; factfinding procedures manual; PAG emails

## Strategic Objective 1.2

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
1.21	Conduct outreach to bar groups and other stakeholders in import injury and unfair import investigations to ensure they understand Commission capabilities and processes.	Outreach efforts.	Efforts made each quarter	OUII	Logs maintained by OUII and OINV tracking outreach efforts
1.22	Engage Commission requestors and other U.S. and international experts to enhance agency capabilities in order to inform and support analysis, data, and nomenclature services.	Feedback provided during briefings and meetings.	Briefings and meetings with requestor and non-requestor experts and a wide range of stakeholders generate actionable feedback	EC	Meeting documentation
1.22(a)	Engage Commission factfinding requestors on Commission work products, understand their priorities, and seek feedback for future Commission work.	Feedback provided during briefings, meetings, and other engagements; actions taken.	Engagement with factfinding requestors related to Commission work product generates feedback; updates to ongoing or future work products taken in response to feedback where appropriate.	EC	Meeting documentation, strategic research prioritization linkage
1.22(b)	Engage non-requestor experts and stakeholders to expand staff expertise, diversify knowledge base, and improve analytical tools to inform and support agency capabilities in factfinding reports.	Feedback provided during briefings, meetings, and other engagements; actions taken.	Engagement with a wide range of academics, NGOs, industry representatives, and other experts on issues related to trade research and analysis; updates to ongoing or future work products taken in response to feedback where appropriate.	EC	Meeting documentation, strategic research prioritization linkage
1.22(c)	Engage requestors, industry experts, and other key stakeholders by hosting at least one trade issue roundtable as well as at least one additional event each fiscal year.	Roundtables held	At least one roundtable and one additional outreach event held per fiscal year	ICA	Roundtable documentation (invite lists, agenda, etc.)

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
1.23	Collect feedback from stakeholders and/or the public to assess effectiveness and efficiency of investigative processes and procedures and implement proposed new processes/procedures as appropriate	Survey issuance or use of other feedback collection vehicle; documentation of ongoing and regular engagement with external stakeholders, feedback received, and, if applicable, processes or /procedures updated.	Collect feedback, and assess and modify processes and/or procedures, as appropriate	INV	Meeting and process/ procedure documentation; survey feedback, if applicable
1.24	Leverage technology to improve efficiency of collection and provision of import injury investigative information for internal and/or external stakeholders	Documentation of processes undergoing the assessment, requirements development, deployment, or evaluation of transition to technology-supported alternatives. Documentation of prioritization.	Assess transition of document collection from Dropbox to Qualtrics; develop requirements for and engage stakeholders on implementation of e-AJ for import injury investigations.	INV	Assessment, prioritization, and requirements' development documentation.
1.25	Maintain timeliness of trade remedy assistance information provided in response to emails submitted through the online TRAO help system and telephone calls to the TRAO phone number	Email and telephone responses to trade remedy inquiries	97% of emails received through the TRAO online help system and phone calls to the TRAO phone number receive responses within 3 working days	TRAO	Logs maintained by TRAO tracking email and telephone responses to trade remedy inquiries

## Strategic Objective 2.1

Goal Number	Performance Goal	Indicator	Target	Lead Office	Data Sources
2.11	Enhance capabilities to analyze priority issues in trade and industry competitiveness	Priority areas identified and capabilities expanded	Prioritize research initiatives within the following broad areas and advance analytical capabilities for the prioritized initiatives. <ul style="list-style-type: none"> <li>a. Economic modeling techniques (e.g., gravity, general equilibrium, and sector-specific models)</li> <li>b. Impact of trade on workers and its distributional effects</li> <li>c. Industry competitiveness and market conditions</li> <li>d. Regional and global supply chains and effects of trade disruptions</li> <li>e. NTMs affecting trade in goods and services and foreign direct investment</li> <li>f. Trade and the environment</li> <li>g. Provisions, including non-tariff provisions, in U.S. trade agreements and their effects on U.S. trading relationships</li> <li>h. Emerging topics recommended by requestors</li> </ul>	EC	Joint EC/ICA research spreadsheet; meeting documentation
2.12	Incorporate new capabilities and improved analytical tools in statutory work products	Share of staff research time reflected in statutory products.	70% of capacity-building research is reflected in statutory work products	EC	Labor cost code database; work product content database.

## Strategic Objective 2.2

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
2.21	Improve utility of tariff and trade information for requestors and the public by developing and producing digital and interactive Commission products	New digital or dynamic Commission product produced for requestors and the public.	At least one new or updated digital or dynamic Commission data product available to requestors and the public	OARS	Publications, Web products
2.22	Improve the accessibility and clarity of Commission factfinding investigations by providing underlying data and models when appropriate	Information posted to the Commission's website.	Publish non-proprietary and non-confidential input data and source code that underlie Commission factfinding investigations completed in the fiscal year, for all investigations for which disclosure is appropriate	EC	<a href="https://www.usitc.gov/data/index.htm">https://www.usitc.gov/data/index.htm</a>
2.23	Improve 508 compliance of Commission information	Prioritized inventory, new templates developed and/or updated processes.	Inventory remaining types of documents that are not 508 compliant to prioritize for compliance to improve accessibility.	ICA	Inventory of remaining types of documents that are not 508 compliant
2.24	Improve the accuracy of published version of the HTS	Identified and corrected information.	HTS updates are at least 98% error-free on publication	TATA	Logs show percentage of errors found during review and percentage of errors identified post-publication
2.25	Improve timeliness of tariff and	Email responses to HTS inquiries.	97% of emails received through online help and	TATA	Data compiled by staff and aggregated for reporting purposes



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<b>Goal Number</b>	<b>Performance Goal</b>	<b>Indicators</b>	<b>Target</b>	<b>Lead Office</b>	<b>Data Sources</b>
	customs information provided in response to emails submitted through online help system		search systems receive responses within 7 working days		

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## Strategic Objective 3.1

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
3.11	Maintain or improve general employee satisfaction, engagement, and satisfaction with DEIA efforts at the Commission	FEVS results related to global satisfaction, employee engagement, and DEIA	Maintain or improve employee satisfaction, engagement, and satisfaction with DEI efforts at the Commission	OAS	FEVS, action plans, meeting minutes, analytical tools developed
3.11(a)	Maintain employee engagement and satisfaction at the Commission.	FEVS results related to global satisfaction and employee engagement.	Maintain or improve over FY 2023 results	OAS	FEVS, action plans, meeting minutes, analytical tools developed
3.11(b)	Improve workforce satisfaction of the Commission's ongoing initiatives and efforts to promote and advance diversity, equity, and inclusion in the workplace.	FEVS results related to DEIA; documentation of priorities set, and actions taken	Priorities set annually	OAS	FEVS; documentation of priorities set, and actions taken.
3.12	Increase stakeholder satisfaction with the extent to which recruiting efforts bring in the right human capital in an efficient way.	FEVS results related to satisfaction with the extent to which recruiting efforts bring in the right human capital in an efficient way.	Improvement over FY 2023 results	OAS	FEVS, action plans, meeting minutes, analytical tools developed
3.13	All hiring actions for permanent positions resulting in an acceptance of an offer meet service level agreements.	Signed service level agreement forms	Improvement over FY 2023 results	OAS	Hiring process data
3.14	Improve stakeholder satisfaction regarding opportunities for professional development to help retain human capital.	FEVS results related to professional development	Improvement over FY 2023 results	OAS	FEVS, action plans, meeting minutes, analytical tools developed
3.15	Foster an inclusive workplace environment by promoting transparency and fair criteria for	Number of project-based or rotational/developmental details and individuals sponsored	Continuously improve training and development opportunities	OAS/HR	Records (log) maintained by HR

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
	training and development opportunities	for leadership development programs			
3.15(a)	Identify and implement developmental details within the Commission	Number of Commission project-based or rotational/developmental details.	Provide at least 2 competitive opportunities for staff across the agency to apply for developmental details.	OAS/HR	Records (log) maintained by HR
3.15(b)	Sponsor and promote through transparent and fair criteria, opportunities for Commission staff to participate in a variety of leadership development programs	Number of individuals sponsored by the Commission	Sponsor at least three individuals at the Commission in FY 2024	OAS/HR	Records (log) maintained by HR
3.16	Improve stakeholder satisfaction regarding the performance management process	FEVS results related to performance management	Maintain or improve upon FY 2023 baseline	OAS	FEVS
3.17	Improve stakeholder satisfaction regarding employee recognition	FEVS results related to recognition	Maintain or improve upon FY 2023 baseline	OAS	FEVS
3.18	Improve stakeholder satisfaction regarding the reasonableness of workload	FEVS Results related to workload	Maintain or improve upon FY 2023 baseline	OAS	FEVS

## Strategic Objective 3.2

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
3.21	Analyze current OCFO structure, compare it to similarly sized agencies, investigate and evaluate system offerings, review Commission policies, and align the foregoing with the operational needs and budgetary realities of the Commission	Report our results of research and analysis, recommend changes and timelines by established deadlines, and begin to execute plans	Finalize analysis and begin to execute change plan within confines of budget	OCFO	Federal Shared Service providers. Small Agency Council, other similar sized agencies
3.22	Maintain a high level of acquisition effectiveness and efficiency	Timeliness and accuracy of procurement actions; customer feedback	Quarterly reviews and annual surveys indicate an effective and efficient acquisition process	OCFO (Procurement, Internal Control/Risk Management)	PRISM; Federal Procurement Data System; Next Generation (FPDS-NG); Procurement Action Lead Times (PALT); contract files
3.22(a)	Maintain high-level targets of procurement actions meeting the Procurement Action Lead Time (PALT)	Share of procurement actions that meet the PALT	Quarterly PALT reviews show that 95% of procurement actions meet the PALT	OCFO (Procurement, Internal Control/Risk Management)	PRISM; OFF; contract files; Procurement log; PALT data
3.22(b)	Gauge satisfaction with procurement process, including efforts to incorporate suggestions/feedback into process, via internal surveys.	Survey results	Maintain or improve satisfaction level relative to FY 2023	OCFO (Budget, Finance, Procurement)	OFF; labor cost database, OCFO SharePoint site, discussions with office Directors and CCMs, Finance and Budget Committee meetings; results of survey administered by OARS
3.22(c)	Ensure that all agency Contract Officer Representatives (CORs) have been properly trained and are maintaining proper COR files	Random sampling of contract files	At least 90% of sampled COR files are maintained properly, and COR training is offered as needed	OCFO (Procurement, Internal Control/Risk Management)	PRISM; Federal Procurement Data System; Next Generation (FPDS-NG); Procurement Action Lead

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
					Times (PALT); contract files
3.23	Maintain a robust system of financial management and internal controls to achieve an annual unmodified audit opinion on the agency's financial statements, with no material weaknesses	Audit opinion on the agency financial statements	Unmodified audit opinion, no material weaknesses	OCFO	OFF; Concur; OCFO SharePoint site; contract files; reconciliations; purchase card log; financial audit opinion
3.24	Maintain a budget process that broadly increases Commission participation and responsibility at all levels, and that clearly links budget formulation with performance planning	Increased participation by managers in budget process; documentation to support resource requests.	Managers at all levels project workloads; estimate and justify the personnel and other resources needed; and clearly link budget formulation to performance planning to provide justification for requests. Also ensure that any requests by Commissioners to amend /improve process are addressed.	OCFO	Budget and Finance Committee meeting minutes; PMSPC meeting minutes; budget files; ERM database; budget templates; personnel costs

## Strategic Objective 3.3

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
3.31	Implement reliable IT solutions that promote resilience, innovation, and efficiency to better support the Commission's user community	Continued refinement of program for tracking percentage availability to users of IT systems that are important to internal and external customers.	Continuation of program	OCIO	
3.31(a)	Maintain availability of core IT systems	Percentage of availability to users of the following core IT systems: Local Area Network (LAN), Remote Access, IS, HTS, DataWeb, and meeting SLA for MS 365.	Maintain core IT system uptime of at least an average of 99.0% availability or meeting SLA for cloud-based services for all measured systems excluding scheduled maintenance.	OCIO	Data are pulled via What's Up Gold monitoring tool.
3.31(b)	Verification and validation of backups. Backups are validated and verified twice a year, no less than three months apart	Confirmation of validation and verification of backups for core business applications and functions: file shares, EDIS, HTS, DataWeb, and MS 365.	100% compliance with performance indicators	OCIO	CommVault backup and restoration records
3.32	Implement secure IT solutions that promote resilience, innovation, and efficiency to better support the Commission's user community	Development of capabilities consistent with government-wide priorities.	Continuation of program	OCIO	
3.32(a)	Ensure all Known Exploited Vulnerabilities (KEV) are remediated in accordance with the timelines set forth in the Department of Homeland Security Cybersecurity and Infrastructure Security Agency (DHS –CISA) KEV Catalog	Number of remediated KEVs found on ITCNET divided by the total number of applicable KEVs in the DHS CISA KEV Catalog, grouped by due date.	100%	OCIO	Nessus scanning output
3.32(b)	Ensure Commission information systems and FEDRAMP certified web-based applications have an	Number of Commission information systems plus number of	100%	OCIO	ATO memos

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
	Ongoing Authorization to Operate (ATO) in place prior to entering operation or upon expiration of the previous ATO	FEDRAMP certified web-based applications with an Ongoing ATO divided by the total number of Commission information systems.			
3.32(c)	Maintain and verify secure configuration baselines on all baselined workstations and servers for 99% of baseline settings	Performance indicator will be improvement over the previous year's score.	Secure configurations maintained on baselined servers and workstations. Approved deviations documented and validated. Compliance rate equal to or higher than previous reporting period	OCIO	Network scans of production network devices
3.32(d)	Ensure the Commission maintains an accurate, near real-time empirical inventory of authorized assets against which all aspects of continuous monitoring (to include but not limited to vulnerability scanning, patching, performance related, etc.) can be performed	Number of authorized assets divided by the total number of assets identified via scanning of all nets and subnets.	95% accuracy of near real-time inventory	OCIO	Vertical specific inventory sources, Nessus scan population

## Strategic Objective 3.4

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
3.41	Data governance policies are issued that strengthen enterprise-wide data management	Additions to the Data Governance Manual by the Data Governance Board (DGB); documentation of prioritization.	Priorities established annually	CDO	Data Governance Manual, emails, DGB decision library
3.42	To advance the agency's mission identify, maintain, and make accessible accurate, timely, and complete information necessary to answer priority questions	Documentation of prioritization of key management questions, data systems documentation, and reports deployed.	Priorities established annually	OARS	DGB Minutes, emails
3.43	Core agency applications and administrative data systems are documented by FY 2026	Meta data, inclusion in the managing data inventory, data quality plans, data glossaries, SOPs, data quality review practices.	20 percent of the identified data systems are documented	OARS	Open Data working group activities, data dictionaries, data glossaries, system description documents
3.44	Ensure application database systems are continuously maintained and periodically upgraded	Requirement's documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.	Develop and implement strengthened functionality, capacity, and security across core Commission database systems by FY 2026.	OARS	System documentation, requirements documentation, evaluation reports
3.44(a)	Continuously improve core Commission database systems (HTS DMS/HTS Search)	Requirement's documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.	Evaluate the effectiveness of the implemented solution and document deficiencies.	TATA	HTS search logs; record of improvements
3.44(a)	Continuously improve core Commission database systems (DataWeb)	Requirement's documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.	Develop and implement improvements to DataWeb	OARS	Requirements' documentation



Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
3.44(a)	Continuously improve core Commission database systems (EDIS)	Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.	Evaluate the effectiveness of the implemented solution and document deficiencies.	SE	Service Lists and other related information retained in EDIS
3.44(a)	Continuously improve core Commission database systems (IDS)	Requirement’s documentation; components developed or enhanced; tools developed and deployed; feedback collected and evaluated.	Evaluate the effectiveness of the implemented advanced search and update the requirements for improving the deployed solution addressing deficiencies.	OCIO	Creation of Investigation data system; information input by various offices
3.44(b)	All new major systems deployed to production are Open Data compliant	Availability of information systems providing Open Data.	Public data behind all new major systems deployed to production in FY 2024 will be available in machine-readable format and accessible on the USITC Open Data webpage	OARS	Open data internet links pointing to EDIS, HTS, investigation data (IDS, Title VII, fact-finding), as these components are deployed. Note that trade data in DataWeb are not included since these data are from Census.

## Strategic Objective 3.5

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
3.51	Improve the efficiency and timely delivery of Commission products by evaluating and implementing improved processes of the agency.	Number of major processes identified; process improvements identified, prioritized, implemented, and evaluated.	Use internal and external performance audits, as well as performance management, ERM, budget and expenditure plan data, and annual Statement of Assurance reporting activities to identify agency processes most in need of improvement; prioritize and implement new processes or process improvements, where identified; evaluate effectiveness of new or amended processes	OP	Document, with changes identified in FY 2023; document implementation ; assessment of impact of changes
3.52	Maintain an agency portfolio of enterprise risks	Quarterly top agency risk summary generated by the Performance Management and Strategic Planning Committee (PMSPC) for the Chair's review.	PMSPC reviews 100% of identified risks at least on a quarterly basis	OP	PMSPC meeting minutes, email, ERM report
3.53	Develop and update key policies and procedures for issuance in the system of internal rules and meet key development and review deadlines in a timely manner.	IAC project plans	Meet 85 percent of established project deadlines for internal rule development, updating, and review	OAS	Electronic repository of record, priorities documentation, submission emails
3.54	Conduct annual evaluations of programs or processes identified as priorities	Priority list developed; evaluation conducted; recommendations issued; improvements made.	Conduct one or more strategic reviews of programs or processes; track	OP	Personnel, payroll, financial, project-related, records-related,

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
			accepted recommendations and actions taken as a result of the prior reviews conducted.		priorities documentation and ICRM or other reports issued
3.55	Continuously enhance the Commission's web presence by integrating current technologies and standards in web design that benefit the Commission's user community and lead to improvements in user satisfaction.	Stakeholder feedback and internal assessments of use of new technologies.	Measure and improve user satisfaction to achieve near-term goal established in FY 2023.	OCIO	Survey responses
3.56	Monitor and ensure the safety and security of our workplace		Improve awareness of physical and personnel safety and security policies and procedures, ensure appropriate security investigations and reinvestigations, and assess employee views on health, safety, and security at the Commission.	OSSS	FEVS, OSSS Communications
3.56(a)	Improve awareness of physical and personnel safety and security policies and procedures.	Physical and personnel safety and security sessions and updates	Hold at least one physical and personnel safety and security training session annually. Disseminate regular agency-wide updates on physical and personnel safety and security issues.	OSSS	OSSS Communications
3.56(b)	Monitor employee perception of their health and safety while on the job	FEVS results related to employee perception of their health and safety while on the job.	Improvement over FY 2023 results	OSSS	FEVS, action plans, meeting minutes, analytical tools developed
3.56(c)	Improve employee sense and	FEVS results related to physical security.	Improvement over FY 2023 results	OSSS	FEVS, action plans, meeting minutes,

Goal Number	Performance Goal	Indicators	Target	Lead Office	Data Sources
	understanding of physical security				analytical tools developed
3.57	In the context of the prerequisite for agencywide capital planning to support the future of work, update policies and procedures for remote work, telework, and flexible schedules	Updated directives and handbooks, documentation of annual priorities, and actions taken to meet annual priorities.	In consultation with the Chairman and Commissioners, and consistent with evolving executive branch policies regarding work environment plans that include telework, remote work and flexible schedules, identify the elements of agency directives and implement, as necessary, revised telework, and remote work, and flexible scheduling policies; produce appropriate directives and handbooks and move them through the internal rules process to issuance.	OAS	Action plans, directives, updated handbooks, meeting minutes, reports

## Appendix C

### Selected Workload Trends

**Table C.1 Summary of Import Injury Investigations, FY 2015–FY 2024**

Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
<b>Instituted</b>										
Preliminary Title VII	12	18	21	18	15	26	11	10	10	22
Final Title VII	10	16	15	21	19	16	23	14	6	13
Other	1	1	2	0	3	3	1	0	2	3
Full Review	8	11	8	7	6	5	9	11	8	7
Expedited Review	16	11	20	10	16	25	17	30	27	30
Total	47	57	66	56	59	75	61	65	53	75
<b>Completed</b>										
Preliminary Title VII	11	19	17	18	19	25	12	10	10	21
Final Title VII	12	13	19	18	15	20	25	13	9	10
Other	1	1	0	2	2	2	2	1	1	4
Full Review	9	6	11	11	7	6	5	6	11	9
Expedited Review	14	12	15	13	17	16	23	22	33	20
Total	47	51	62	62	60	69	67	52	64	64

**Table C.2 Summary of Unfair Import Investigations and Ancillary Proceedings, FY 2015–FY 2024**

Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Instituted	47	79	64	74	59	52	82	71	55	61
Completed	50	64	61	61	60	67	64	90	60	46

**Table C.3 Summary of Industry and Economic Analysis Investigations,  
FY 2015–FY 2024**

Status	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Instituted	11	13	12	11	16	15	9	11	8	6
Completed	15	14	13	10	13	14	9	9	12	7

Note: Instituted and completed totals include both recurring and non-recurring reports. Investigation totals reflect the historical record available in IDS, which became available in FY 2023, and may be more complete (higher) than reported in earlier years of this report.